

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – POMONA COURTHOUSE SOUTH

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

Plaintiff,

vs.

PUENTE HILLS IMPORTS, a California
corporation; PUENTE HILLS TOYOTA, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

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

Plaintiff,

vs.

PUENTE HILLS IMPORTS, INC., an
unknown business entity; PUENTE HILLS
TOYOTA, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 21PSCV00503 (Lead)
(Consolidated with Case No. 21PSCV00626)

Honorable Thomas C. Falls
Department R

**DECLARATION OF JOSE MANUEL
BARREIRO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, GENERAL RELEASE FEES,
AND SETTLEMENT
ADMINISTRATION COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Labor
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys' Fees and Costs,
General Release Fees, and Settlement
Administration Costs; Declaration of
Plaintiffs; Counsel (Edwin Aiwazian);
Declaration of Plaintiff (Cristal Preciado);
and [Proposed] Order and Judgment filed
concurrently herewith]

Reservation ID:	042537380910
Date:	September 29, 2022
Time:	10:00 a.m.
Department:	R

<i>Barreiro</i> Action Filed:	June 17, 2021
<i>Preciado</i> Action Filed:	August 2, 2021
Trial Date:	None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6

7
8
9
10
11
12
13
14
15
16
17
18

19
20
21
22
23
24
25
26

27

28

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 **12 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Puente Hills.

5. I spent about **4 hours** reviewing the settlement papers and about **3 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 fee in the amount of \$7,500.00 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 a general release fee, 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.

06/21/2022
Executed this ____ day of June 2022 at La Puente, California.

Electronically Signed

2022-06-21 23:32:21 UTC - 75.80.124.20

Jose Manuel Barriero

Nexte AssumeScrip

84f1c494b4d6ff-474019c0c0eb701669a

Jose Manuel Barreiro