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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 CRISTAL
PRECIADO 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 Aiwarzian);
Declaration of Plaintiff (Jose Manuel
Barreiro); and [Proposed] Order and
Judgment filed concurrently herewith]

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

Barreiro Action Filed: June 17, 2021
Preciado Action Filed: August 2, 2021
Trial Date: None Set

DECLARATION OF CRISTAL PRECIADO

I, **Cristal Preciado**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the one of the named plaintiffs in the above-captioned consolidated cases. 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 Puente Hills Imports, Inc. dba Puente Hills Toyota (“Puente Hills”) as an hourly-paid, non-exempt employee from approximately June 2020 to approximately September 2020. I decided to seek legal advice about my work experiences at Puente Hills 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 Puente Hills 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 **9 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **7 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action.

3. I have spent over **15 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 Puente Hills, 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 Puente Hills. 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.

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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 **14 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 **3 hours** reviewing the settlement papers 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 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.

06/22/2022

Executed this _____ day of June 2022 at El Monte, California.

Electronically Signed: 2022-06-23 01:23:43 UTC - 137.25.99.212

Crista Pindy

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Cristal Preciado