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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – TORRANCE COURTHOUSE

JOANA FLORES, individually, and on behalf
of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

v.

ALLIANCE GROUND INTERNATIONAL
LLC; Delaware limited liability company; and
DOES 1 through 100, inclusive

Defendants.

Case No.: 21TRCV00424

Honorable Douglas W. Stern
Department B

CLASS ACTION

**DECLARATION OF JOANA FLORES
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Vartan Madoyan); and [Proposed]
Order filed concurrently herewith]

Date: June 13, 2024
Time: 8:30 a.m.
Department: B

RES ID: 975166282879

Complaint Filed: June 10, 2021
Trial Date: None Set

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1 the settlement is granted preliminary approval, the Court will certify a class for settlement
2 purposes and likely appoint me as the representative of the class and my attorneys as counsel for
3 the class. I understand that I will need to check in on, monitor, and speak with my attorneys to
4 facilitate the settlement administration process and to provide information if the Court needs
5 additional information to assess if the settlement is fair, reasonable, and adequate.

6 5. I have spent over **7 hours** meeting with my attorneys regarding the cases and
7 fulfilling my responsibilities as a named plaintiff and class and PAGA representative, which
8 included gathering documents concerning my employment with Defendant, reviewing
9 documents with my attorneys and answering their questions, providing guidance regarding the
10 duties of hourly-paid, non-exempt employees, and helping develop a strategy as to what
11 documents and information to obtain from Defendant. I routinely checked in with my attorneys
12 and their staff to make sure that they had all of my most current information and any additional
13 information that I had obtained.

14 6. Throughout the case, I was available to answer any questions my attorneys had,
15 and available to speak and meet with my attorneys whenever they needed me. I responded to
16 them as quickly as possible and gave them as much information and identified as many
17 documents as I could. I spent at least **5 additional hours** speaking with my attorneys about the
18 case, identifying potential witnesses, providing my attorneys with documents and information
19 concerning the cases, and also describing policies, practices, and procedures of Defendant.

20 7. As far as the settlement is concerned, I was available to review documents and
21 answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement-related
22 agreement and about **2 hours** asking questions and discussing the potential settlement with my
23 attorneys before signing the settlement agreement.

24 8. I believe that I have done everything that my attorneys have asked of me and have
25 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
26 and the State of California. I think my efforts helped to get the result obtained in the cases, and
27 as a class and PAGA representative, I respectfully request that the Court award me a class
28 representative service payment in the amount of **\$10,000.00** for my active participation in the

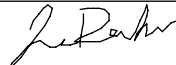
1 cases. Taking into consideration the time that I have dedicated to this case and will continue to
2 dedicate, and the fact that I brought this case despite risk of retaliation, I believe that this amount
3 is reasonable.

4 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

5 10. I have not entered into any undisclosed agreements, nor have I received any
6 undisclosed compensation in the cases. The only compensation I will receive is whatever amount
7 the Court awards as a class representative service payment, my share of the settlement as a class
8 member and as an aggrieved employee.

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 on 05/09/2024, at Redondo Beach, California.

12 Electronically Signed  2024-05-09 18:16:22 UTC - 107.119.53.56
13 Nintex AssureSign® abb8273d-4c6b-42f0-a49b-b16b0129ba47

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