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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 Patricia A. Young
Department B

CLASS ACTION

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

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

Date: July 17, 2026
Time: 8:30 a.m.
Department: B

RES ID: 975166282879

Complaint Filed: June 10, 2021
FAC Filed: July 25, 2025
Trial Date: None Set

DECLARATION OF JOANA FLORES

I, **JOANA FLORES**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case and in *Joana Flores v. Alliance Ground International LLC, et al.*, Case No. 21TRCV00424, which is being resolved along with the above-captioned case. 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 am an hourly-paid, non-exempt employee of Alliance Ground International LLC (together, “Defendant”). During my employment with Defendant, I am claiming that I have performed work off-the-clock and experienced what I believe to be wage-and-hour violations, including and not limited to, performing work before clocking in and after clocking out, and short, late, interrupted, and/or missed meal periods and rest periods. Also, during my employment with Defendant, I learned Defendant’s employment policies, procedures, and practices and it is my understanding, based on what I was told and experienced, that Defendant maintained and applied the same employee handbook and payroll, timekeeping, and wage and hour policies and practices to all of its hourly-paid and non-exempt employees in California..

3. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure the Defendant was held accountable for not paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

4. I understand that a settlement has been reached to resolve the claims, and I further understand what my duties and responsibilities are as a class representative. I am aware that if

1 the settlement is granted final approval, the Court will certify a class for settlement purposes and
2 likely appoint me as the representative of the class and my attorneys as counsel for the class. I
3 understand that I will need to check in on, monitor, and speak with my attorneys to facilitate the
4 notice and 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
cases. Taking into consideration the time that I have dedicated to this case and will continue to

1 dedicate, and the fact that I brought this case despite risk of retaliation, I believe that this amount
2 is reasonable.

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

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

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct. 06/16/2026

10 Executed this ____ day of June 2026, at Redondo Beach, California.

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