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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

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

Plaintiff,

vs.

PALO ALTO HILLS GOLF AND
COUNTRY CLUB, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 21CV382771

Honorable Theodore C. Zayner
Department 19

**DECLARATION OF ARMANDO
RODRIGUEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRIVATE
ATTORNEYS GENERAL ACT (CAL. LAB.
CODE § 2698, *ET SEQ.*) SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION
COSTS**

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

Date: October 30, 2024
Time: 1:30 p.m.
Department: 19

Complaint Filed: June 7, 2021
Trial Date: None Set

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documents, identifying potential witnesses, and also describing policies, practices, and procedures of Palo Alto.

5. I spent about **3 hours** reviewing the settlement agreement 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 \$10,000.00 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 whatever amount the Court awards as 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.

05/18/2023

Executed this ____ day of May 2023, at Palo Alto, California


Veritas AssureSign® 97c26662-27c0-403e-a711-60070007e63f

Armando Rodriguez