

1 MATERN LAW GROUP, PC
MATTHEW J. MATERN (SBN 159798)
2 Email: mmatern@maternlawgroup.com
MATTHEW W. GORDON (SBN 267971)
3 Email: mgordon@maternlawgroup.com
ERIN R. HUTCHINS (SBN 346557)
4 Email: ehutchins@maternlawgroup.com
2101 E. El Segundo Boulevard, Suite 403
5 El Segundo, California 90245
Telephone: (310) 531-1900
6 Facsimile: (310) 531-1901

7 Attorneys for Plaintiff
GONZALO G. ORDONES SOCOP, individually, and
8 on behalf of all others similarly situated

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF LOS ANGELES — SPRING STREET COURTHOUSE

12 GONZALO G. ORDONES SOCOP, an
13 individual, on behalf of herself and all others
similarly situated,

14 Plaintiff,

15 vs.

16 MIRACLE MILE PROPERTIES, LP, a limited
17 partnership; MIRACLE MILE PROPERTIES,
INC., a corporation; PARKWOOD KNOLL
18 APARTMENTS, a business entity, form
unknown; DECISIONHR, INC., a corporation;
19 DECISIONHR I, INC., a corporation; and
20 DOES 1 through 50, inclusive,

21 Defendants.
22
23
24
25
26
27
28

Case No.: 21STCV32715

[Assigned for all purposes to the
Honorable Laura A. Seigle, Dept. SS17]

**DECLARATION OF PLAINTIFF
GONZALO G. ORDONES SOCOP IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Dept.: SS17

Action Filed: September 3, 2021
FAC Filed: January 24, 2022
Trial Date: Not Set

DECLARATION OF GONZALO G. ORDONES SOCOP

I, GONZALO G. ORDONES SOCOP, hereby declare as follows:

1. I am the named plaintiff in the above-entitled action, *Ordonez v. Miracle Mile Properties, LP, et al.*, Los Angeles Superior Court, Case No. 21STCV32715. I make this declaration on the basis of personal firsthand knowledge, except as to those matters stated in information and belief. If called as a witness, I could and would readily and competently testify to all matters stated within.

2. I make this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement (the "Motion").

3. I was employed by Defendant Miracle Mile Properties, LP ("Defendant") as a Maintenance Worker from in or about June 2018 through in or about March 2021 at Defendant's Highland, California location. My duties included addressing the property's plumbing issues, maintaining the property, clearing out gutters, and painting the parking lot lines and outdoor buildings.

4. I brought this action under the California Labor Code Private Attorneys General Act of 2004 ("PAGA"). I have acted as a representative of the state and on behalf of other non-exempt aggrieved employees of Defendant.

5. I have spent approximately 20 hours on this case, including, but not limited to: reviewing and signing a declaration opposing Defendant's Motion to Compel Arbitration, telephonic meetings with my attorneys, searching for and producing relevant documents to my attorneys, preparing for and responding to questions from my attorneys in preparation for mediation, and reviewing and signing the settlement agreement with my attorneys to ensure that its terms are fair and achieve PAGA's objectives.

6. I fully realized the risks I would be taking by pursuing this action as a PAGA representative. I knew that my future employer might conduct a background check on me or otherwise find out about my participation in the lawsuit against a previous employer and might retaliate against me as a result. I also knew that, as a PAGA representative, I would be bearing risks that other aggrieved employees would not be facing.

7. I also knew that I placed myself at a substantial risk because if Defendant were to

1 prevail in this action, I could have been liable for Defendant's litigation costs. Yet I felt so strongly
2 about standing up for the rights of Defendant's employees that I initiated and participated fully in this
3 lawsuit.

4 8. From the time I became a PAGA representative in this litigation, I took an active role in
5 participating in decisions concerning the case, including settlement. I maintained regular contact with
6 my attorneys, via phone, to give them additional information and to keep myself informed of the
7 developments in the case. I made sure that I understood everything that was going on in the case so I
8 could make the best informed decisions on behalf of the state and other aggrieved employees.

9 9. I believe that the requested \$10,000.00 Service Payment for serving as a PAGA
10 representative is reasonable given the substantial time and effort I have expended on behalf of the
11 other aggrieved employees and the risks I faced in serving as a named plaintiff. As part of the
12 Settlement, I am releasing my individual wage and hour claims against Defendant and waiving my
13 rights under Civil Code § 1542 as to any and all claims against Defendant. I believe that I should
14 receive an enhancement award, in part, because this is a more comprehensive release than the release
15 that is applicable to the other aggrieved employees.

16 10. Moreover, based on my information and belief, approximately 239 aggrieved
17 employees will be able to recover penalties for the alleged wage and hour violations. Because I put
18 myself on the line, each aggrieved employee did not have to expend his or her own time and resources
19 to pursue legal remedies individually. This action would not have been possible without my active
20 participation and my willingness to place myself at risk for the sake of the other aggrieved employees.
21 In addition, the LWDA will receive approximately \$215,397.86 as 75 percent of the PAGA Penalties,
22 which is a substantial amount to punish Defendant for the alleged Labor Code violations, to deter
23 future violations, and to assist the LWDA with the enforcement of labor laws.

24 11. I know that without my efforts, this lawsuit would not have been brought on behalf of
25 the aggrieved employees of Defendant and the aggrieved employees would not have received payment
26 for civil penalties. Throughout this entire litigation, I did the best that I could to represent the state
27 and other aggrieved employees and to look out for their interests.

28 ///

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed on _____, 2024 at _____, California.

3
4 _____
5 GONZALO G. ORDONES SOCOP
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MATERN LAW GROUP, PC
MATTHEW J. MATERN (Matrícula del Colegio de Abogados del Estado No. 159798)
Correo electrónico: mmatern@maternlawgroup.com
MATTHEW W. GORDON (Matrícula del Colegio de Abogados del Estado No. 267971)
Correo electrónico: mgordon@maternlawgroup.com
ERIN R. HUTCHINS (Matrícula del Colegio de Abogados del Estado No. 346557)
Correo electrónico: ehutchins@maternlawgroup.com
2101 E. El Segundo Boulevard, Suite 403
El Segundo, California 90245
Teléfono: (310) 531-1900
Fax: (310) 531-1901

Abogados del Demandante
GONZALO G. ORDONES SOCOP, de manera individual y
en representación de todas las demás personas que se encuentren en una situación similar

TRIBUNAL SUPERIOR DEL ESTADO DE CALIFORNIA
PARA EL CONDADO DE LOS ÁNGELES — TRIBUNAL DE SPRING STREET

GONZALO G. ORDONES SOCOP, una
persona física, en su nombre y en
representación de todas las demás personas en
una situación similar,

Demandante,

vs.

MIRACLE MILE PROPERTIES, LP, una
sociedad limitada; MIRACLE MILE
PROPERTIES, INC., una corporación;
PARKWOOD KNOLL APARTMENTS, una
entidad comercial, forma desconocida;
DECISIONHR, INC., una corporación;
DECISIONHR I, INC., una corporación; y
DEMANDADOS DESCONOCIDOS DEL 1 al
50, inclusive,

Demandados.

Causa N.º: 21STCV32715

[Asignado a todos los efectos a
Su Sría. Laura A. Seigle, Dept. SS17]

**DECLARACIÓN DE GONZALO G.
ORDONES SOCOP, DEMANDANTE, EN
APOYO A LA PETICIÓN DEL
DEMANDANTE DE APROBACIÓN DEL
ACUERDO EN VIRTUD DE LA PAGA**

Depto.: SS17

Demanda presentada el: 3 de septiembre de
2021

FAC Presentado: 24 de enero de 2022

Fecha de juicio: No se ha fijado

1 agraviados no asumirían.

2 7. También sabía que me había puesto en una posición en la que corro un riesgo
3 considerable de que, en caso de que el Demandado triunfara en esta acción, podría ser responsable de
4 tener que pagar los costos de litigio del Demandado. Sin embargo, tenía sentimientos tan fuertes con
5 respecto a defender los derechos de los empleados del Demandado que inicié este juicio y participé
6 plenamente en él.

7 8. Desde que me convertí en representante de la PAGA en este litigio, asumí una
8 participación activa en las decisiones sobre el caso, incluso en el acuerdo. Mantuve contacto regular
9 con mis abogados, por teléfono, para darles información adicional y mantenerme informado sobre los
10 desarrollos del caso. Me aseguré de comprender todo lo que sucedía en el caso, para poder tomar las
11 mejores decisiones informadas en nombre del estado y de otros empleados agraviados.

12 9. Creo que el Pago por Servicios de \$10,000.00 solicitado por los servicios como
13 representante de la PAGA es razonable dado el tiempo y esfuerzos sustanciales que utilicé en nombre
14 de los demás empleados agraviados y los riesgos que enfrenté al actuar como demandante principal.
15 Como parte de la Conciliación, exoneré mis reclamos individuales de salarios y horas en contra del
16 Demandado y renuncio a mis derechos conforme al artículo 1542 del Código Civil con respecto a
17 todos los reclamos en contra del Demandado. Creo que debería recibir una mejora en la asignación, en
18 parte, porque la mía es una exoneración más completa que la exoneración que se aplica a los demás
19 empleados agraviados.

20 10. Además, a mi leal saber y entender, aproximadamente 239 empleados agraviados
21 podrán recuperar el pago de sanciones por las violaciones de salarios y horas alegadas. Gracias a que
22 me puse en este lugar, cada empleado agraviado no tuvo que utilizar su propio tiempo ni recursos para
23 buscar un resarcimiento legal de manera individual. Esta acción no hubiera sido posible sin mi
24 participación activa y mi voluntad de ponerme en riesgo por el bien de los demás empleados
25 agraviados. Además, la LWDA recibirá aproximadamente \$215,397.86, que constituyen el 75 por
26 ciento de las Sanciones en virtud de la PAGA y es un importe considerable para castigar al
27 Demandado por las supuestas violaciones al Código Laboral, para disuadir futuras violaciones y para
28 ayudar a la LWDA a exigir el cumplimiento de las leyes laborales.

1 11. Sé que sin mis esfuerzos, este juicio no hubiera podido llevarse a cabo en nombre de los
2 empleados agraviados del Demandado, y que los empleados agraviados no habrían recibido un pago
3 de sanciones civiles. Durante todo el litigio, hice lo mejor que pude para representar al estado y a los
4 demás empleados agraviados y velar por sus intereses.

5 Declaro bajo pena de perjurio conforme a las leyes del Estado de California que lo que
6 antecede es verdadero y correcto. Firmado el 20 de noviembre de 2024, en San Bernardino,
7 California.

8 

9 Gonzalo Ordones Socop (Nov 20, 2024 18:27 PST)

10 GONZALO G. ORDONES SOCOP



AML-Global
AMERICAN LANGUAGE SERVICES

M a k i n g t h e W o r l d S m a l l e r

CERTIFICATION OF TRANSLATION
AFFIDAVIT FOR TRANSLATION OF SAID DOCUMENT

American Language Services, a company specializing in the translation of documents, certifies the following:

- American Language Services has retained a professional translator for the attached **English** into **Spanish** document. The document is referred to as:

**"DECLARATION OF PLAINTIFF GONZALO G. ORDONES SOCOP IN
SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA
SETTLEMENT"**

- I affirm that such translation has been prepared by a duly qualified translator, who has confirmed that such translation is, to the best of their knowledge and belief, a true and accurate translation in **Spanish** of the corresponding **English** document.
- I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Notwithstanding the foregoing affirmations, no liability is assumed for errors and omissions in the translation of the attached document.
- Executed on this **Eighteenth** day of **November**, 2024, at Los Angeles, California.



REUBEN TRUJEQUE
AMERICAN LANGUAGE SERVICES

 **MEMBER**
American Translators Association

Member # 244894

1849 SAWTELLE BLVD. SUITE 600 LOS ANGELES, CALIFORNIA 90025
TEL (310) 829-0741 FAX (310) 829-3222
translation@alsglobal.net
www.alsglobal.net

CALIFORNIA JURAT

GOVERNMENT CODE § 8202

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of LOS ANGELES



Subscribed and sworn to (or affirmed) before me on

this 18th day of November, 2024, by
Date Month Year

(1) REUBEN TRUJEQUE

(and (2) -----),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Place Notary Seal and/or Stamp Above

Signature 
Signature of Notary Public

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document "DECLARATION OF PLAINTIFF GONZALO G. ORDONES SOCOP IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT"

Title or Type of Document: _____

Document Date: See attached Number of Pages: 4

Signer(s) Other Than Named Above: _____