

Armond M. Jackson, SBN 281547
ajackson@jacksonapc.com
Andrea M. Fernandez-Jackson, SBN 295924
afernandez@jacksonapc.com
Anthony S. Filer, Jr., SBN 337704
afiler@jacksonapc.com
JACKSON APC
2 Venture Parkway, Suite 240
Irvine, California 92618
Phone: (949) 281-6857
Fax: (949) 777-6218

Attorneys for Plaintiff Celia Martinez,
individually, and on behalf of all other similarly
situated employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE—CIVIL COMPLEX CENTER**

CELIA MARTINEZ, as an individual and on
behalf of other similarly situated employees,

Plaintiff,

vs.

RUBY BROTHERS III, a California
corporation; RUBY CORP., a California
corporation, MCRU, INC., a California
corporation, RUBY BROTHERS, a California
corporation, RUBY BROTHERS TOO, a
California corporation, E RUBY PARTNERS,
LLC, a California corporation, and DOES 1-50,
inclusive,

Defendants.

Case No.: 30-2021-01204252-CU-OE-CXC

Assigned for all purposes to:
Hon. Peter J. Wilson
Dept. CX101

**DECLARATION OF PLAINTIFF CELIA
MARTINEZ IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 6, 2023
Time: 2:00 p.m.
Place: Department CX101

Action Filed: June 4, 2021
Trial Date: None

1 **DECLARATION OF CELIA MARTINEZ**

2 I, Celia Martinez, declare as follows:

3 1. I am over the age of eighteen and have personal knowledge of everything stated
4 below and could competently testify to these facts if sworn.

5 2. I submit this Declaration in support of the motion for final approval of class action
6 settlement and class representative enhancement fee.

7 3. I worked for Defendants. As I worked for Defendants as an hourly worker during the
8 class period. While working for Defendants, I worked very hard, especially when I worked above
9 five and six hours and not able to take all of my entitled meal breaks and rest breaks. After my
10 employment ended with Defendants, I determined that I would attempt to effectuate a change in
11 Defendants' practices and policies through a representative action under the Private Attorney
12 General Act and class action.

13 4. After consulting with a law firm, I decided to file a Private Attorney General Action
14 claim and class action against Defendants. I would consider myself a low wage hourly worker but
15 despite this I still decided to take the risk of filing this class action and losing this case that could
16 have exposed myself to certain attorneys' fees and costs incurred by Defendants. However, my
17 passion to vindicate the rights of my coworkers outweighed the risk exposure to myself as I believed
18 that my co-workers deserved to be treated fairly in the eyes of the law.

19 5. Throughout this case, I was required to appear at my attorneys' office, answering
20 questions during several interviews by my attorney and his staff either in person or via telephone
21 related to the case, and locating and submitting documents to my attorney in support of the claims.

22 6. I remained involved and provided information and details about Defendants'
23 practices and policies in support of the class claims so that the claims could be maximized for the
24 class members. Through the litigation I made myself available to complete the settlement agreement
25 and finalize the terms of the settlement agreement and execute the settlement agreement.

26 7. In this litigation, I was committed throughout the entire process to ensure that the
27 class members were treated fairly and committed approximately 50 hours to this case.
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1 I declare under the penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on this 10 day of March 2023 in Irvine, California.
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Celia Martinez, Declarant

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