

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

BRIANNA FLORES, TANIA ESTREMER, individually, and on behalf of other members of the general public similarly situated; DEXTER NORMAN HANSEN, individually, and on behalf of the other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiffs,

vs.

BISCOMERICA CORP., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVDS1930814

Honorable David S. Cohn
Department S26

CLASS ACTION

**DECLARATION OF BRIANNA FLORES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Declaration of Proposed Class Counsel (Edwin Aiwazian); Declarations of Proposed Class Representative (Tania Estremera) and Proposed PAGA Representative (Dexter Norman Hansen); and [Proposed] Order filed concurrently herewith.]

Date: April 29, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: October 15, 2019
FAC Filed: July 28, 2021
Trial Date: None Set

DECLARATION OF BRIANNA FLORES

I, **Brianna Flores**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in 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 was employed by Defendant Biscomerica Corp. ("Biscomerica") in an hourly-paid, non-exempt position from approximately July 2017 to November 2017. I decided to seek legal advice about my work experiences with Biscomerica 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 Biscomerica paid me and other employees what was owed to us 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 **5 hours** to discuss my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **14 hours** meeting with my attorneys and fulfilling my responsibilities as a class representative in this case, which included gathering documents concerning my employment with Biscomerica, reviewing documents with my attorneys and answering their questions, and providing guidance regarding the work performed by non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Biscomerica. I frequently checked in with my attorneys and their staff to make sure that they had my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **12 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information

concerning the case, and also describing policies, practices, and procedures of Biscomerica.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement documents and about **2 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement papers.

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 represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me an enhancement award in the amount of \$6,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

8. 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 an enhancement award, as well as my share of the settlement fund as a class member.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 04/05/2022, at Fontana, California.

Electronically Signed: 2022-04-05 20:35:48 UTC - 172.58.29.65
Vertex AssureSign® 0798d2a-f9bb-4f95-a4e4-a6e0151ab77

Brianna Flores