

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Elizabeth Parker-Fawley (SBN 301592)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

MELISA REYES, 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,

vs.

SCE FEDERAL CREDIT UNION, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 21STCV09629

Honorable Elihu M. Berle
Department 6

CLASS ACTION

**DECLARATION OF MELISA REYES IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Class Counsel (Elizabeth Parker-
Fawley); and [Proposed] Order filed
concurrently herewith]

Date: July 12, 2024
Time: 9:00 a.m.
Department: 6

Complaint Filed: March 11, 2021
FAC Filed: August 16, 2021
Trial Date: None Set

DECLARATION OF MELISA REYES

I, **Melisa Reyes**, 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. 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 SCE Federal Credit Union ("Defendant") from approximately July 2018 to approximately May 2020 as an hourly-paid, non-exempt employee. 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 Defendant was held accountable for not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 11 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 a PAGA representative.

3. I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of 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 was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 14 additional hours speaking with my attorneys about the

1 case, identifying potential witnesses, providing my attorneys with documents and information
2 concerning the case, and also describing policies, practices, and procedures of Defendant.

3 5. As far as the settlement is concerned, I was available to review documents and
4 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
5 agreement and about 2 hours asking questions and discussing the potential settlement with my
6 attorneys before signing the settlement agreement.

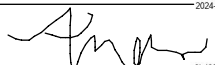
7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
9 and the State of California. I think my efforts helped to get the result obtained in this case, and as
10 a class and PAGA representative, I respectfully request that the Court award me an enhancement
11 award in the amount of \$7,500.00 for my active participation in this case. Taking into
12 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

14 8. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this case. The only compensation I will receive is whatever amount
16 the Court awards as a class representative enhancement award, as well as my share of the
17 settlement as a class member and as an aggrieved employee.

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

20
21 Executed this 12 day of June 2024, at Baldwin Park, California

22
23  2024-06-12 17:52:05 UTC - 47.143.208.8
Nintex AssureSign® 9b408b91-c3ef-4630-ac61-b18d01215d6f

24 Melisa Reyes