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Attorneys for Plaintiffs and Aggrieved Employees

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

RACHEL QUIJADA, as an individual and
on behalf of aggrieved employees,

Plaintiff,

vs.

EXTRA SPACE MANAGEMENT, INC.,
a Utah corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 21CV385899

**DECLARATION OF SASAN AZAR IN
SUPPORT OF PLAINTIFFS' MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: April 25, 2024
Time: 1:30 p.m.
Dept: 7

Complaint Filed: August 17, 2021
Trial Date: None

1 1. I, SASAN AZAR, declare as follows:

2 2. I am over the age of eighteen (18). I submit this Declaration in support of the
3 concurrently filed Motion for Approval of the Settlement Agreement of the Private Attorney
4 General Act (“Settlement” or “Settlement Agreement”) and Enhancement award. The following
5 is based upon my personal knowledge, and if called as a witness, I could and would competently
6 testify regarding the statements in this Declaration.

7 3. I am currently a resident of Orange County California. I was employed by
8 Defendant, Extra Space Management Inc. (“Defendants” or “Extra Space”) from approximately
9 January 2020, to February 18, 2021 as non-exempt assistant manager, earning an hourly wage in
10 California. I hired the Law Offices of Sean S. Vahdat & Associates, APLC to represent me in
11 bringing a representative action on behalf of myself and all other similarly situated employees of
12 Defendant, and we did on or about September 28, 2021, when the PAGA action complaint was
13 filed in the count of Orange, Superior Court Case No. 30-2021-01223381-CU-OE-CXC. The
14 Complaint was amended subsequently to assert the proper legal name of Defendant. Subsequent
15 to attending mediation I did join the action in this court by filing an amended Complaint to the
16 Quijada action. I also filed a request for dismissal in the Orange County action. I understand that
17 I have brought claims against Defendants as the representative of aggrieved employees and the
18 State of California.

19 4. I believe my situation is similar and has been similar to all other employees like me
20 who worked for Defendants during the time period involved in this case, and the Complaints
21 alleged claims against Defendants for failure to pay minimum wages and overtime, failure to
22 provide breaks, failure to pay for all hours worked, failure to reimburse expenditures, and other
23 related claims in accordance with the California Labor Code. I believe my claims are typical of
24 the other Class Members and I can represent our common claims because I believe Defendants
25 applied the same policies, practices and schedules for us all and treated me and all aggrieved
26 employees in various California locations.

27 5. I believe that my interests have been and continue to be in alignment with the
28 Aggrieved employees, and I am willing to continue to pursue their claims against Defendants in

1 this litigation. I believe I do not have any interests which are against the interests of the Aggrieved
2 Employees, and I will continue to do what is best for all the Aggrieved Employees and the State
3 of California rather than myself, as I have done from the beginning of this case.

4 6. As one of the named representatives in this case, I participated a lot and have been
5 informed of the progress. I believe I have maintained the best interests of the Aggrieved
6 Employees and the State of California while performing my Representative duties, and I
7 participated in many telephonic interviews and conferences with counsel regarding the conduct
8 and settlement of this matter. I have spoken with other aggrieved employees and provided
9 information regarding their claims to my counsel. My counsel has informed me that this
10 information, along with the details and support I provided for my claims, were very important in
11 convincing Defendants to negotiate the settlement now before the Court for approval. I have also
12 provided documents to my counsel in support of my claims. These documents consisted of
13 documents that I had to take time to gather. I have invested a lot of time and effort in performing
14 my duties on behalf of the Aggrieved Employees, and the State of California. I conducted
15 numerous telephonic conferences with my counsel to prepare for and discuss information requests
16 anticipated in preparation for mediation. I had to be available during a full days mediation, and
17 discussed the case past mediation and to date.

18 7. After reviewing the Settlement Agreement and speaking with my counsel about it,
19 I agreed to sign it on behalf of myself and all the Aggrieved employees and the State of California.
20 I signed because I believe the Settlement obtained in this case on behalf of the Aggrieved
21 employees and the State is fair and sufficient and reasonable in view of the facts I know and have
22 been made aware of, and due to the risk of going through further litigation when this case has
23 already been in litigation for a long time.

24 8. Aside from the Representative Enhancement, I have not received and understand I
25 will not receive any consideration or promises that are different from any of the other Aggrieved
26 Employee will receive under the Settlement.

27 9. I also understand my counsel will request that I be awarded an enhancement
28 payment of \$10,000 for my efforts as the PAGA Representative, and that this additional payment

1 is not guaranteed, but must be approved by the Court. I believe the requested enhancement
2 payment is fair and reasonable based upon the excellent result we have achieved for the State and
3 the Aggrieved Employees and because of the many tasks I have performed on their behalf,
4 including:

5 10. Discussions with other co-workers regarding the case, and gathering their
6 information and providing it to counsel;

7 11. Compilation of documents for my attorneys;

8 12. Review of many documents with my attorneys;

9 13. Conducting discovery and mediation preparation with my attorneys and
10 participating in responding to information responses for mediation, and continuing the assistance
11 of my counsel while the settlement agreement was being ironed out;

12 14. Also many telephone conferences with my attorneys;

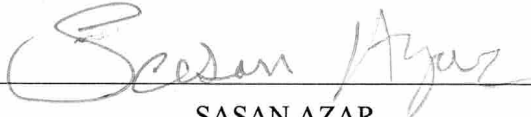
13 15. I also believe the requested enhancement award is fair and reasonable because my
14 decision to accept the risk of being a PAGA Representative in a representative action under the
15 Labor Code may affect my future. I risked this lawsuit having a negative impact on future
16 employment opportunities, as prospective employers may be less inclined to hire an employee who
17 has served as a class representative. I also understood and accepted the risk of being liable for the
18 opposing parties' costs and attorneys' fees if I was unsuccessful in this lawsuit. I voluntarily
19 assumed these big risks and the case would not have been brought without me. I believe the State
20 and the Aggrieved employees might not even be aware of their rights if not for my claims and this
21 action, will receive a great benefit by resolving their claims against Defendants under the terms of
22 the Settlement Agreement.

23 16. Furthermore I have signed a General Release of all known and unknown claims,
24 which will prevent me from bringing any claim against the Defendants in the future.

25 I declare under penalty of perjury of the laws of the State of California that the
26 foregoing is true and correct.
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Executed on this 15th Day of January, 2024, at Orange Count, California.


SASAN AZAR