

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
Susan J. Perez (SBN 329044)
sperez@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ELIA PAREDES ACOSTA, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

SMG/LONG BEACH CONCENTION
AND ENTERTAINMENT CENTER, a
business entity form unknown; and DOES
1 through 100,

Defendants.

CASE NO. 21STCV27103

*[Case assigned for all purposes to the Hon.
Stuart M. Rice, Dept. SSC-1]*

**DECLARATION OF ELIA PAREDES
ACOSTA IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

Action Filed: July 23, 2021

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, Elia Paredes Acosta, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant SMG/Long Beach Convention and Entertainment Center (“Defendant”) in California from approximately March 2018 until August 2021. Defendant failed to pay me for time spent undergoing security checks at the start of every shift. Waiting in line during these security checks was mandatory and could take up to three minutes as our bags and IDs were searched individually. I was not allowed to clock in until afterwards, which meant I did not receive pay for these security checks. In addition, for at least a portion of my employment with Defendant, I was not paid for all hours worked because Defendant used a timekeeping system that rounded our shifts in quarter-hour increments. For these reasons, I believe I did not receive all the wages I had earned at the time I stopped working for Defendant.

3. When I first filed my lawsuit, I understood that it had the chance to benefit Defendant's other workers by helping them recover money and penalties they were owed. I felt that Defendant was not following the law, and I wanted Defendant to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other class members because I have been actively involved in the litigation since it began, and because it is my name that is attached to the lawsuit. Although I was aware of the risks associated with filing a public lawsuit, I chose to move forward with the case anyway. Through my efforts, Defendant has agreed to a settlement that will benefit current and former employees of Defendant, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

4. I have been actively involved in this case since before it was even filed. Among other things, I searched for relevant documents for use in the lawsuit, provided factual information to my attorneys, had many phone calls with my attorneys to discuss the claims in the lawsuit and

1 Defendant's practices, discussed the status of the case and general case strategy with my attorneys
2 on multiple occasions, had my deposition taken, helped my attorneys respond to discovery
3 requests, provided valuable input to assist my attorneys in preparing for mediation, made myself
4 available for the full-day mediation that lead to this settlement, reviewed and provided input
5 regarding the settlement in this case, and otherwise assisted my attorneys in moving this case
6 towards resolution. I estimate that I have spent approximately 35-40 hours in total on these
7 activities.

8 I declare under penalty of perjury under the laws of the state of California and the United
9 States that the foregoing is true and correct.

10 Executed on Jan 27, 2025, in Los Angeles, California.

11 
12 Elia Acosta Paredes (Jan 27, 2025 16:05 PST)
13 Elia Paredes Acosta
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28