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Attorneys for Plaintiff

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

MAYRA CORTEZ individually, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

v.

BARKSDALE, INC., a Delaware Corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV35127

Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

**DECLARATION OF MAYRA CORTEZ
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class and
Representative Action Settlement;
Declaration of Proposed Class Counsel
(Yasmin Hosseini); and [Proposed] Order
filed concurrently herewith]

Date: December 6, 2022
Time: 10:30 a.m.
Department: 12

Complaint Filed: August 9, 2021
Trial Date: None Set

DECLARATION OF MAYRA CORTEZ

I, **Mayra Cortez**, 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 am employed by Barksdale, Inc. ("Barksdale") in an hourly-paid, non-exempt Assembler position and have been since April 2014. I decided to seek legal advice about my work experiences with Barksdale 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 Barksdale was held accountable for not paying its employees 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 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 7 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 eventually a PAGA representative.

3. I have spent over 18 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 Barksdale, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Barksdale. 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. I was available to answer any questions my attorneys had, and 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 17 additional hours speaking with my attorneys about the case, identifying potential

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

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 5 hours reviewing the settlement
5 agreement and about 6 hours asking questions and discussing the potential settlement with my
6 attorneys before signing the settlement agreement.

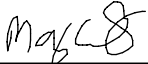
7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
9 and the State of California. I think my efforts helped to get the result obtained in this case, and
10 as a class and PAGA representative, I respectfully request that the Court award me a class
11 representative service payment in the amount of \$10,000.00 for my active participation in this
12 case. Taking into consideration the time that I have dedicated to this case, I believe that this
13 amount is reasonable.

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

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

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

21 Executed this ^{09/21} day of September 2022, at Huntington Park, California.

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23 Electronically Signed 2022-09-28 22:45:44 UTC - 108.216.176.233
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