

Edwin Aiwazian (SBN 232943)  
Joanna Ghosh (SBN 272479)  
Matthew Richard Soto (SBN 353499)  
**LAWYERS for JUSTICE, PC**  
410 West Arden Avenue, Suite 203  
Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021

*Attorneys for Plaintiff Andrea Rodriguez*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

ANDREA RODRIGUEZ, individually, and on behalf  
of other aggrieved employees pursuant to the California  
Private Attorneys General Act;

Plaintiff,

vs.

KAN DI KI, LLC, a California limited liability  
company; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21BBCV004466

Honorable Jared D. Moses  
Department P

**DECLARATION OF ANDREA RODRIGUEZ  
IN SUPPORT OF PLAINTIFFS' MOTION FOR  
APPROVAL OF PRIVATE ATTORNEYS  
GENERAL ACT (CAL. LABOR CODE § 2698,  
ET SEQ.) SETTLEMENT AGREEMENT AND  
AWARD OF ATTORNEYS' FEES AND COSTS,  
GENERAL RELEASE FEE, AND  
SETTLEMENT ADMINISTRATION COSTS**

Reservation ID: 115837372268  
Date: April 1, 2025  
Time: 9:30 a.m.  
Department: P

Complaint Filed: May 6, 2021  
FAC Filed: December 13, 2024  
Trial Date: None Set

**DECLARATION OF ANDREA RODRIGUEZ**

I, **Andrea Rodriguez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Kan Di Ki, LLC (“Defendant”) from approximately January 2018 to approximately January 2021 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 its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **3 hours** discussing my situation, representative action lawsuits under the Private Attorney General Act (“PAGA”), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent over **10 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, providing a declaration in support of Plaintiff’s opposition to Defendant’s motion to compel arbitration, providing a supplemental declaration in support of Plaintiff’s sur-opposition to Defendant’s motion to compel arbitration, 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 **6 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 Defendant.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement and about **1 hour** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

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 seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case.

7. For my broader individual waiver and release of claims with a California Civil Code Section 1542 waiver (set forth in Section 9(b) of the Settlement Agreement), the Settlement provides for a General Release Fee in the amount of \$7,500.00, to be paid out of the Total Settlement Amount, subject to Court approval. I respectfully request that the Court award me full payment of the General Release Fee.

8. I am not related to anyone associated with Lawyers *for* Justice, PC or Diversity Law Group, P.C.

9. 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 a general release fee, as well as my share of the settlement as an aggrieved employee.

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

Executed this 11/15 day of November 2024, at Apple Valley, California.

Electronically Signed 2024-11-13 17:08:55 UTC - 71.95.35.162  
Nintex AssureSign® 09498842-182-426d-a534-b2260149bd59

Andrea Rodriguez