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Attorneys for Plaintiff

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

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

Plaintiff,

vs.

LOS ALTOS GOLF & COUNTRY CLUB, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 21CV386789

Honorable Theodore C. Zayner
Department 19

**DECLARATION OF CRISTOBAL
FLORIAN IN SUPPORT OF
PLAINTIFF'S 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
EXPENSES**

[Notice of Motion and 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 Expenses; Declaration of
Plaintiff's Counsel (Elizabeth Parker-
Fawley); and [Proposed] Order and Judgment
filed concurrently herewith]

Date: December 11, 2024
Time: 1:30 PM
Department: 19

Complaint Filed: September 16, 2021
Trial Date: None Set

DECLARATION OF CRISTOBAL FLORIAN

I, Cristobal Florian, 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 Los Altos Golf & Country Club ("Defendant") in an hourly-paid, non-exempt Food Prepper/Busser position from approximately April 2014 to August 2020. I decided to seek legal advice about my work experience with Defendant. 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 and stopped its practice of not properly compensating aggrieved employees. 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 2 hours. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for 13 hours discussing my situation, representative actions in general, and what it meant to bring an action under the California Private Attorneys General Act ("PAGA").

3. I have spent over 15 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 and answering their questions, providing information regarding the duties of hourly, 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 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 14 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.

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Cristobal Florian