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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

YASMINE RAMIREZ BARAHONA,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiff,

v.

CARL’S JR. 800 INC., a California
corporation; BJ MART, LLC, an unknown
business entity; BR MART, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Lead Case No.: 21STCV20100
Related to Case No. 21STCV33550

Honorable Elihu M. Berle
Department SSC6

CLASS ACTION

**DECLARATION OF YASMINE
RAMIREZ BARAHONA IN SUPPORT
OF PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

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

Date: September 26, 2023
Time: 10:00 a.m.
Department: SSC6

Complaint Filed: May 27, 2021
Trial Date: None Set

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1 4. Throughout the cases, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least **12 additional hours** speaking with my attorneys about the
5 cases, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the cases, and also describing policies, practices, and procedures of Defendants.

7 5. As far as the settlement is concerned, I was available to review documents and
8 answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement-related
9 agreement and about **5 hours** asking questions and discussing the potential settlement with my
10 attorneys before signing the settlement agreement.

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

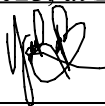
18 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

19 8. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in the cases. The only compensation I will receive is whatever
21 amount the Court awards as an enhancement award, my share of the settlement as a class
22 member and as an aggrieved employee, and payment from Defendants in connection with a
23 contemplated separate confidential individual settlement and general release agreement.

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

08/10/2023

26 Executed this _____ day of August 2023, at Los Angeles, California.

27 
28 Nintex AssureSign® 6c26c430-a64a-4188-928b-a05ad124ac9f

Yasmine Ramirez Barahona a/k/a Jasmine Ramirez