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*Attorneys for Plaintiff and the Class*

**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.

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 FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT, ATTORNEYS’ FEES,  
COSTS, AND ENHANCEMENT AWARD**

Date: August 28, 2024  
Time: 9:00 a.m.  
Department: SSC6

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

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1           4.       I understand that a settlement has been reached to resolve the claims, and I further  
2 understand what my duties and responsibilities are as a class representative. I am aware that if  
3 the settlement is granted preliminary approval, the Court will certify a class for settlement  
4 purpose, and likely appoint me as the representative of the class and my attorneys as counsel for  
5 the class. I understand that I will need to check in on, monitor, and speak with my attorneys to  
6 facilitate the notice and settlement administration process, and to provide information if the  
7 Court needs additional information to assess if the settlement is fair, reasonable, and adequate.  
8 Further if class members contact me, I will take steps to refer them to the settlement  
9 administrator so that they can obtain whatever information and notice they may be eligible to  
10 receive in connection with the settlement and contemplated final approval hearing.

11           5.       I have spent over 14 hours meeting with my attorneys regarding the cases and  
12 fulfilling my responsibilities as a named plaintiff and class and PAGA representative, which  
13 included gathering documents concerning my employment with Defendants, reviewing  
14 documents with my attorneys and answering their questions, providing guidance regarding the  
15 duties of hourly-paid, non-exempt employees, and helping develop a strategy as to what  
16 documents and information to obtain from Defendants. I routinely checked in with my attorneys  
17 and their staff to make sure that they had all of my most current information and any additional  
18 information that I had obtained.

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

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

          8.       I believe that I have done everything that my attorneys have asked of me and have

1 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees  
2 and the State of California. I think my efforts helped to get the result obtained in the cases, and  
3 as a class and PAGA representative, I respectfully request that the Court award me an  
4 enhancement award in the amount of \$9,000.00 for my active participation in the cases. Taking  
5 into consideration the time that I have dedicated to the cases, I believe that this amount is  
6 reasonable.

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

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

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

15 10/25/2023

Executed this \_\_\_\_ day of October 2023, at Los Angeles, California.

16 Electronically Signed 2023-10-26 03:01:36 UTC - 172.56.120.35  
  
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