

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Ovsanna Takvoryan (SBN 217435)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

YESENIA ROJAS, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

FRANK-LIN DISTILLERS PRODUCTS,
LTD., a California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: FCS055208

Honorable Christine A. Carringer
Department 12

CLASS ACTION

**DECLARATION OF YESENIA ROJAS
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 (Ovsanna Takvoryan); and
[Proposed] Order filed concurrently
herewith]

Hearing Date: May 11, 2022
Hearing Time: 8:30 a.m.
Department: 12

Complaint Filed: August 13, 2020
Jury Trial Date: None Set

1
2 **DECLARATION OF YESENIA ROJAS**

3 I, **Yesenia Rojas**, hereby declare as follows:

4 1. I am over 18 years of age and a resident of California. I am the named plaintiff in
5 the above-captioned case. I have personal knowledge of the facts and statements set forth in
6 this declaration, and if called upon to testify, I could and would competently testify thereto.

7 2. I was employed by Frank-Lin Distillers Products, Ltd. (“Frank-Lin”) as an hourly-
8 paid, non-exempt employee from approximately October 2013 to October 2018. I decided to
9 seek legal advice about my work experiences with Frank-Lin and about pursuing my grievances.
10 I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwazian.
11 I wanted to do whatever I could to make sure Frank-Lin was held accountable for not paying its
12 employees for all hours worked and non-compliant meal and rest breaks. After speaking with
13 the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and
14 did some research into the leading class action and employment law firms in California for
15 approximately 9 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for
16 7 hours discussing my situation, complex wage-and-hour class actions and representative
17 actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be
18 a named plaintiff, class representative and PAGA representative.

19 3. Since becoming involved in this matter, I have spent over 25 hours meeting with
20 my attorneys regarding the case and fulfilling my responsibilities as a class and, eventually,
21 PAGA representative, which included gathering documents concerning my employment with
22 Frank-Lin, reviewing documents with my attorneys and answering their questions, answering
23 questions and providing guidance regarding the duties of non-exempt, hourly employees, and
24 helping develop a strategy as to what documents and information to obtain from Frank-Lin. I
25 routinely checked in with my attorneys and their staff to make sure that they had all of my most

1 current information and any additional information that I had obtained.

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

8 5. On April 14, 2021, I attended a deposition that lasted approximately 3.5 hours,
9 which deposition recessed and reconvened the next day, on April 15, 2021, and lasted
10 approximately 2 hours, for a total of 5.5 hours. I spent at least 4 hours preparing for the
11 deposition. After the deposition, I spent at least 4 hours reviewing my testimony and discussing
12 the contents of the deposition transcript with my attorneys.

13 6. As far as the settlement is concerned, I was able to review documents and answer
14 any questions my attorneys had. I spent about 2 hours reviewing the settlement agreement and
15 about 3 hours asking questions and discussing the potential settlement with my attorneys before
16 signing the settlement agreement.

17 7. I believe that I have done everything that my attorneys have asked of me and have
18 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
19 and the State of California. I think my efforts helped to get the result obtained in this case, and
20 as a class and PAGA representative, I respectfully request that the Court award me an
21 enhancement award in the amount of \$10,000.00 for my active participation in this case. Taking
22 into consideration the time that I have dedicated to this case, I believe that this amount is
23 reasonable.

24 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

25 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 an enhancement payment, as well as my share of the settlement as a class member and 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.

02/04/2022

Executed this ____ day of February 2022, at Fairfield, California.

Electronically Signed 2022-02-05 06:54:19 UTC - 76.103.84.174
Yesenia Rojas
Nintex AssureSign® 24711c7b-08ca-46d8-9470-a6320143ad45

Yesenia Rojas