

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
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 MARIN**

MARGARET TAYLOR, individually, and
on behalf of other members of the general
public similarly situated and other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

vs.

BARBIER SECURITY GROUP, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 2000399

Honorable Stephen Freccero
Department A

CLASS ACTION

**DECLARATION OF BRIAN J. ST. JOHN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Plaintiff's Motion for Preliminary Approval of
Class Action Settlement; Declaration of
Proposed Class Counsel (Brian J. St. John); and
[Proposed] Order filed concurrently herewith]

Date: _____
Time: _____
Department: A

Complaint Filed: January 31, 2020
FAC Filed: June 23, 2022
Trial Date: None Set

DECLARATION OF MARGARET MACEDO

I, **Margaret Macedo**, 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 Defendant Barbier Security Group (“Defendant”) in an hourly non-exempt position as a Logistics Receiver from July 2015 to April 2018. I decided to seek legal advice about my work experiences 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 for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **9 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative.

3. I have spent over **16 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and later as a PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance 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 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 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 **12 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case,

1 and also describing policies, practices, and procedures of Defendant. During the discovery phase
2 of the litigation, I spent approximately **7 additional hours** reviewing Defendant's discovery
3 requests, locating documents, and providing documents and responses to my attorneys

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement
6 and about **3 hours** asking questions and discussing the potential settlement with my attorneys
7 before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and as
11 a class and PAGA representative, I respectfully request that the Court award me an Enhancement
12 Award in the amount of \$7,500.00 for my active participation in this case. Taking into
13 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an enhancement award, as well as my share of the settlement as a class
18 member and as an aggrieved employee.

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

21 Executed this ^{07/14/2022}____ day of June 2022, at Vacaville, California.

22 Electronically Signed 2022-06-16 01:01:29 UTC - 73.170.136.173
Margaret Macedo
Hintex AssureSign® 583c1146-7aeb-4d54-8851-aeb5016e4dd1

23 Margaret Macedo
24
25
26
27
28