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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

GODOFREDO HERNANDEZ, individually, on
behalf of all others similarly situated, and on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

MARINA LANDSCAPE SERVICES, INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 21STCV31406

CLASS & REPRESENTATIVE ACTION

**DECLARATION OF PLAINTIFF
GODOFREDO HERNANDEZ IN
SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

DECLARATION OF PLAINTIFF GODOFREDO HERNANDEZ

I, Godofredo Hernandez, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Marina Landscape Services, Inc. ("Defendant"). I worked for Defendant from approximately November 2017 to approximately September 2020 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the Second Amended Class & Representative Action Complaint.

4. I joined this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks.

5. By initiating this action, having been the first-named plaintiff and participating in this lawsuit as a class representative, I hoped that I might be able to change Defendant's policies to better protect the working conditions of my co-workers. I understood that it was my duty as a class representative to represent the best interests of the class over my own individual claims.

6. I have invested a lot of personal time into this lawsuit because I wanted to help the absent class members as much as I could. As detailed more fully below, I have spent approximately 40-45 hours on this case.

7. Throughout this litigation, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information regarding the claims at issue. Additionally, leading up to the mediation in October 2022, and leading up to the second mediation

in April 2024, I had multiple lengthy phone calls with Wilshire Law Firm, PLC regarding the nuanced issues that were to be advanced at mediation.

8. Throughout the case, I spent numerous hours looking for the documents to help the case, including when I first contacted my attorneys, before my attorneys filed the case, and before my case was mediated.

9. On the day of the first mediation and the day of the second mediation, I made myself fully available and was in continuous contact with my attorneys to assist with any questions or issues that may have arisen.

10. I believe the settlement achieved is a great settlement and I would recommend that the Court approve it because I believe that it is fair, adequate, and reasonable. I am glad that I was able to assist in achieving this result for the class members.

11. Joining this class action was not an easy decision for me. I was concerned by the attention a publicly filed lawsuit would attract. Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to be done about it.

12. I understand that the settlement agreement provides a service payment to me in the amount of \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, I have entered into a general release, which is broader than the release that will bind other class members. I am receiving no compensation additional to that provided for in the settlement.

13. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's defenses.

14. I have no conflicts of interest with any class member or the Settlement Administrator.

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

Firmado por:

 Godofredo Hernández