

Benjamin H. Haber (SBN 315664)
benjamin.haber@wilshirelawfirm.com
Arrash T. Fattahi (SBN 333676)
arrash.fattahi@wilshirelawfirm.com
Arman A. Salehi (SBN 351112)
arman.salehi@wilshirelawfirm.com
WILSHIRE LAW FIRM
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

**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
VICTOR MALDONADO-JIMENEZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF VICTOR MALDONADO-JIMENEZ

I, Victor Maldonado-Jimenez, 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 July 2022 to approximately July 2023 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 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 8-10 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.

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

9. I believe the settlement achieve 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.

10. 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.

11. I understand that the settlement agreement provides a service payment to me in the amount of \$5,000.00. 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.

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

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

14. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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.

Executed on 2/19/2026, at Pacoima, California.

Signed by 
Victor Maldonado-Jimenez