

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
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 ALAMEDA**

CIOMARA AYALA DOLORES,
individually, and on behalf of other members
of the general public similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

INLAND MARINE COMPANY, INC., an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: RG19039075

Honorable Michael M. Markman
Department 16

CLASS ACTION

**DECLARATION OF CIOMARA AYALA
DOLORES 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 (Edwin Aiwazian) and [Proposed]
Order filed concurrently herewith.]

Reservation No. 352390080210
Date: April 14, 2022
Time: 3:30 p.m.
Department: 17

Complaint: October 15, 2019
FAC Filed: January 26, 2022
Jury Trial: None Set

DECLARATION OF CIOMARA AYALA DOLORES

I, **Ciomara Ayala Dolores**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 Inland Marine Industries, Inc., (“Inland Marine”) in an hourly-paid, non-exempt position from approximately January 2017 to October 2017. I decided to seek legal advice about my work experiences with Inland Marine and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Inland Marine paid me and other employees what was owed to us 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 5 hours to discuss my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I initially spent over 16 hours meeting with my attorneys and fulfilling my responsibilities as a class and PAGA representative in this case, which included gathering documents concerning my employment with Inland Marine, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the work performed by non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Inland Marine. I frequently checked in with my attorneys and their staff to make sure that they had 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 them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least 10 additional hours speaking with my attorneys about the

case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Inland Marine.

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

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

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

8. 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 award, as well as my share of the settlement fund 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.

Executed on 02/28/2022, at San Leandro, California.

Electronically Signed 2022-03-01 01:14:09 UTC - 98.239.110.145
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Ciomara Ayala Dolores