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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

CHRISTOPHER RODRIGUEZ, 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.

ARKEMA INC., an unknown business entity;
BOSTIK, INC., an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

Case No. BC721328

Honorable Maren E. Nelson
Department SSC17

CLASS ACTION

**DECLARATION OF CHRISTOPHER
RODRIGUEZ 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]

Date: June 20, 2022

Time: 9:00 a.m.

Department: SSC17

Complaint Filed: September 17, 2018

FAC Filed: October 31, 2018

SAC Filed: December 26, 2018

TAC Filed: August 25, 2020

FAC Filed: July 9, 2021

FAC Filed: January 4, 2022

Trial Date: None Set

DECLARATION OF CHRISTOPHER RODRIGUEZ

I, **Christopher Rodriguez**, 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 Arkema Inc. and Bostik, Inc. ("Defendants") as an hourly-paid, non-exempt employee from approximately October 2013 to approximately April 2016. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there, including Arby Aiwazian. I wanted to do whatever I could to make sure Defendants paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **7 hours**. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for **6 hours** discussing my situation, complex wage-and-hour class actions and representative actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **17 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as both a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. 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.

1 4. Throughout the case, I was available to answer any questions my attorneys had, and
2 available to speak and meet with my attorneys whenever they needed me. I responded to them as
3 quickly as possible and gave them as much information and identified as many documents as I
4 could. I spent at least **13 additional hours** speaking with my attorneys about the case, identifying
5 potential witnesses, providing my attorneys with documents and information concerning the case,
6 and also describing policies, practices, and procedures of Defendants.

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

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

18
19 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

20 8. I have not entered into any undisclosed agreements, nor have I received any
21 undisclosed compensation in this case. The only compensation I will receive is whatever amount
22 the Court awards as a service award, as well as my share of the settlement as a class member and
23 aggrieved employee.
24

25 ///

26 ///

27 ///
28

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

03/04/2022

3 Executed this ____ day of March 2022, at Corona, California.

4 
5 Electronically Signed: 2022-03-04 17:29:03 UTC - 84.17.44.150
Hintex AssureSign® 6b727420-5f58-42cd-9f32-ae4e011f92cc

Christopher Rodriguez

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