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Attorneys for Plaintiffs
ALEJANDRO VALENZUELA and ANGELEIGH MANJARREZ, individually and on behalf of the
putative class

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

ALEX FURTADO, an Individual, on behalf of
himself and all others similarly situated,

Plaintiff,

vs.

BAMIA 2, LLC, a California limited liability
company; REEF GLOBAL, INC., a Florida
Corporation; REEF TECHNOLOGY, INC., a
corporate form unknown; and DOES 1-100,
Inclusive,

Defendants.

CASE NO.: 21STCV37585

*[Assigned for all purposes to the Honorable
Elihu M. Berle, Department 006]*

DECLARATION OF PARIS JOHNSON

Date: TBD
Time: TBD
Dept: 6

DECLARATION OF PARIS JOHNSON

I, Paris Johnson, declare as follows:

1. I am over the age of eighteen and submit this declaration in support of Plaintiff's Motion for an Order (1) Preliminarily Approving the Class Action Settlement; (2) Approving Notice of Class Action Settlement; and (3) Setting Hearing for Final Approval (the "Motion").

2. All matters contained herein are within my personal knowledge and belief, and, if called and sworn, I can and will testify completely thereto. I was not promised any benefit nor induced to provide this Declaration in any way, but am submitting it in support of Plaintiff's request that this Court grant preliminary approval of the Parties' Joint Stipulation and Settlement Agreement (the "Stipulation").

3. I was employed by Bamia 2, LLC ("Defendant") during the relevant period of this action. While working for Defendant, I did not receive legal minimum wages for all hours I worked and did not receive overtime wages for all the overtime hours I worked. In addition, I did not receive legally compliant meal and rest periods while I worked for Defendant, and did not receive meal or rest period premium wages for noncompliant meal and rest periods. Defendant also failed to reimbursement for business expenses I incurred. Defendant also failed to provide me with accurate and legally compliant wage statements throughout my employment, and failed to pay me all wages due to me at the time of my separation from Defendant's employment. After talking with my co-workers, I found out that my claims are typical of what happened to them.

4. I believe that I am an "aggrieved employee" within the meaning of the PAGA, and a proper representative to bring a civil action on behalf of other current and former employees of Defendant. I was employed by Defendant within a year prior to filing the complaint and have alleged uniform policies and practices that were committed against me and other coworkers.

5. I understand that Defendant has employed other employees in California, and throughout California, and I have alleged, on behalf of myself and other non-exempt, hourly employees of Defendant, that we were subjected to common policies and procedures. I further understand that our claims are that Defendant engaged in a practice of: failing to pay minimum wages due and owed; failing to pay overtime wages; failing to maintain accurate time and payroll records; failing to provide legally compliant meal

1 periods and rest breaks; failing to pay timely wages during employment; failing to pay all wages due to
2 terminated or quitting employees; failing to provide accurate wage statements; and unfair and unlawful
3 business practices.

4 6. After consulting and meeting with my counsel regarding complaints I had against
5 Defendant for the above enumerated claims, I agreed to represent my fellow employees in bringing this
6 class action. I also understand that I am serving as the representative plaintiff on behalf of other similarly
7 situated aggrieved employees in California.

8 7. I understand that on February 4, 2022, my counsel filed a class action complaint in
9 Sacramento County Superior Court alleging the following claims against Defendant: (1) Failure to Pay
10 All Minimum Wages; (2) Failure to Pay All Overtime Wages; (3) Meal Period Violations; (4) Rest Period
11 Violations; (5) Wage Statement Violations; (6) Waiting Time Penalties; (7) Failure to Reimburse
12 Necessary Business Expenses; and (8) Unfair Competition.

13 8. As a former employee of Defendant, I believe that my claims are similar to those of the
14 other workers whom I seek to represent. I and the other employees who are part of the Class were subjected
15 to similar procedures, practices, and policies. I believe my claims are typical of the employees whom I
16 seek to represent, our interests are aligned, and I am adequate to represent them. Further, I understand
17 that, in representing the interests of the classes, I am assuming a fiduciary responsibility to all absent class
18 members.

19 9. To my knowledge, there are no conflicts which exist between my interest in this action and
20 the interest of the class members that would impair my ability to serve as a representative.

21 10. I have assisted, and will continue to assist, in the investigation, prosecution, and settlement
22 of this matter. I understand my duties and responsibilities to the class members and will carry out those
23 duties, as necessary. In that regard, I have been informed and understand that courts may award class
24 plaintiffs money for serving as a class representative, but I am not entitled to such money as a matter of
25 right, and that I have not been promised or guaranteed money for being a class representative. I understand
26 we are filing the present Motion seeking preliminary approval from the Court of an award of my requested
27 Class Representative Service Payment of \$10,000.00, which would be in addition to my individual
28 settlement payment as a Settlement Class Member, as set forth in the Stipulation.

1 11. Before and after the Complaint initiating this action, I have had numerous conversations
2 and exchanged correspondence with the attorneys of Falakassa Law, P.C. and Bokhour Law Group, P.C.
3 (“Class Counsel”). After speaking with Class Counsel, I learned how a class action and representative
4 action lawsuit could address the complaints I shared with other similarly situated employees of Defendant.
5 I was happy to be able to bring a lawsuit as a class representative to try and obtain the unpaid wages and
6 other compensation not only for myself, but also for fellow employees like me, who had not been paid for
7 all their hours worked, had not received all overtime and minimum wages owed, and had not received all
8 required meal and rest breaks.

9 12. From the beginning of my involvement in this case, my attorney informed me about what
10 it meant to be a class representative. I understood that I was expected to represent and even champion the
11 other employees’ interests, placing their interests ahead of my own, and that my claims and damages had
12 to be similar to theirs. Thus, I understood it to be my duty to ensure that all similarly situated employees
13 receive the compensation that they are owed.

14 13. I agreed to proceed as a class representative because it was important to me that my fellow
15 employees get paid for all the hours they worked and were under Defendant’s control, and not just myself.
16 My attorney explained to me in great detail the risks, responsibilities, and duties of being a class
17 representative. As a class representative, I understood it was my responsibility to actively participate in
18 the lawsuit to safeguard the interests of other similarly situated employees, and to ensure that my interests
19 were not in conflict with those of the other employees. I did so to the best of my ability. I do not believe
20 that I have any interests that are averse to those of the employees whom I seek to represent and have placed
21 and will continue to place the interests of the class above my own.

22 14. I was glad to serve as a named Plaintiff and a class representative of my fellow similarly
23 situated employees, but this case has required a major time commitment from me and has demanded my
24 attention and focus. I have spent a substantial amount of time and energy contributing to the investigation,
25 prosecution, and settlement of this case. I estimate that I have spent at least 10 hours on the following
26 tasks:

- 27 a. Talking to my attorney about getting involved in this case;

- b. Being interviewed in detail by my counsel regarding the working conditions at Defendant's places of business, and particularly the nature and extent of my experiences and the policies and practices that applied to my employment and the employment of the other similarly situated employees;
- c. Searching for and gathering all relevant documents in my possession and providing them to my attorneys;
- d. Speaking with my attorney about potential witnesses and Class Members;
- e. Regularly receiving and responding to correspondence and phone calls from my attorney, including during mediation sessions, regarding the claims and Defendant's arguments;
- f. Participating in preparation for a mediation session and remaining available to answer questions and provide necessary approval; and
- g. Conducting numerous conferences with my attorneys regarding the Stipulation and finalizing the Stipulation, and regarding the settlement administration proceedings and preliminary and final approval processes.

15. Throughout this case, I have frequently spoken with my attorney, and stayed in even closer contact when dealing with specific issues. My attorney often had questions for me about Defendant and my work experience there during his investigation of the case. My attorney also asked me to review documents related to the case, including the Stipulation and many of the pleadings we filed, and I made sure to promptly respond and comply with his requests.

16. I have chosen to represent those who may be afraid to speak up because of fear of being fired or retaliated against. I have remained in contact with my attorney regarding the litigation and anticipate that I will continue to be contacted by class members regarding the status of the settlement, including fielding questions regarding the issuance of settlement payments.

17. One of my fears is potential retaliation against me for filing this lawsuit. I expect that wherever I work in the future, it is possible that my employer and immediate supervisors may have heard of my involvement with this case. Any prospective employer doing a simple internet search on me will learn of my role as an instigator in this lawsuit. Although they are not supposed to retaliate against me, I think the reality is that I may experience a certain stigma for years to come, and I fear retaliation or other

1 adverse consequences will arise in my future employment due to my decision to serve as a named Plaintiff
2 and Class Representative in a class action against my employer.

3 18. I reviewed the Stipulation with Class Counsel to understand the benefits and risks and
4 ultimately determined it was fair and reasonable. Therefore, I followed Class Counsel's recommendation
5 to settle the claims. I took a huge risk by coming forward to help with this class action. If I had lost the
6 case and been ordered to pay Defendant's litigation costs, it would have been financially devastating to
7 me.

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

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12 Executed on 6/27/2023 at Sacramento ca, California

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14 DocuSigned by:
15 *Paris Johnson*
16 3AB6FAE6425B4A9

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PARIS JOHNSON