

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

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

RENE LABRADO, individually, and on behalf
of other members of the general public
similarly situated; AMY PUGH, 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;

Plaintiffs,

vs.

JTH TAX INC. DBA LIBERTY TAX
SERVICE, a California corporation; and DOES
1 through 100, inclusive,

Defendants.

Case No.: BC715076

Honorable Maren E. Nelson
Department SSC17

CLASS ACTION

**DECLARATION OF AMY PUGH IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Plaintiffs' Motion for Preliminary Approval
of Class Action Settlement; Declaration of
Proposed Class Counsel (Yasmin Hosseini);
Declaration of Proposed Class
Representative (Rene Labrado); and
[Proposed] Order filed concurrently
herewith]

Date: April 14, 2022
Time: 10:00 a.m.
Department: SSC17

Complaint Filed: July 30, 2018
FAC Filed: December 9, 2021
Trial Date: None Set

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2

3
4
5
6

7
8
9
10
11
12
13
14
15
16
17
18

19
20
21
22
23
24
25
26

27
28

1 13 additional hours speaking with my attorneys about the case, identifying potential witnesses,
2 providing my attorneys with documents and information concerning the case, and also describing
3 policies, practices, and procedures of Liberty Tax Service.

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

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

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

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement payment, as well as my share of the settlement as a class
19 member and as an aggrieved employee.

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

22 Executed this ^{3/17/22} day of March 2022, at San Bernardino, California.

23 Electronically Signed: 2022-03-18 02:57:10 UTC - 47.41.238.117
Amy Pugh
hntex AssureSign® 92b5aa76-80c4-4340-85f3-ae5a013ab447

24 Amy Pugh