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Attorneys for Plaintiff Yuri Milon

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

YURI MILON, individually, and on behalf of
other members of the general public similarly
situated; OLIMPIA MEZA PELAYO,
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;
EMILIO LOPEZ, 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,

v.

DAVID & ESPERANZA CHAVEZ FAMILY
LIMITED PARTNERSHIP DBA CHAVEZ
SUPERMARKET, a California limited
partnership; and DOES 1-100, inclusive,

Defendants.

Case No.: 20CV368379

Honorable Theodore C. Zayner
Department 19

**DECLARATION OF YURI MILON
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notion of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed
Class Counsel (Yasmin Hosseini and
David D. Bibiyan); Declaration of
Proposed Class Representatives (Olimpia
Meza Pelayo and Emilio Lopez); and
[Proposed] Order filed concurrently
herewith]

Date: October 2, 2024
Time: 1:30 p.m.
Department: 19

Complaint Filed: July 17, 2020
FAC Filed: February 23, 2024
Trial Date: None Set

DECLARATION OF YURI MILON

I, **Yuri Milon**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 David & Esperanza Chavez Family Limited Partnership dba Chavez Supermarket ("Defendant") as an hourly-paid, non-exempt employee from approximately November 2018 to approximately March 2019, in the State of California. I decided to seek legal advice about my experiences working for Defendant 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 Defendant was held accountable for not paying their 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 5 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for approximately 6 hours discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and a class representative.

3. I have spent over approximately 25 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys and answering questions, providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and to provide them with any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had,

1 and available to speak and meet with my attorneys whenever they needed me. I responded to
2 them as quickly as possible and gave them as much information and identified as many
3 documents as I could. I spent at least 18 additional hours speaking with my attorneys about the
4 case, identifying potential witnesses, providing my attorneys with documents and information
5 concerning the case, and also describing policies, practices, and procedures of Defendant.

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

10 6. I believe that I have done everything that my attorneys have asked of me and have
11 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
12 obtained in this case, and as a class representative, I respectfully request that the Court approve
13 and award me a service payment in the amount of \$12,000.00 for my active participation in the
14 case. Taking into consideration the time that I dedicated to this case, I believe that this amount
15 is reasonable.

16 7. I am not related to anyone associated with Lawyers *for* Justice, PC or Bibiyan
17 Law Group, P.C.

18 8. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this case. The only compensation I will receive is a service
20 payment as well as my share of the settlement as a class member.

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

05/09/2024

23 Executed this ____ day of May 2024, at East Palo Alto, California.

24

Electronically Signed	2024-05-09 07:41:14 UTC - 24.130.159.83
Yuri Milon	
Nintex AssureSign®	a53258e4-7ed0-4121-a851-a164016840d4

25 Yuri Milon