

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 ORANGE**

SONNY LE, 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.

BALBOA WATER GROUP LLC, an  
unknown business entity; and DOES 1  
through 100, inclusive,

Defendants.

Case No. 30-2019-01042358-CU-OE-CXC

Honorable Peter J. Wilson  
Department CX102

**CLASS ACTION**

**DECLARATION OF SONNY LE 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: April 21, 2022  
Time: 2:00 p.m.  
Department: CX102

Complaint Filed: January 7, 2019  
FAC Filed: March 28, 2019  
SAC Filed: December 30, 2021  
Trial Date: None Set

**DECLARATION OF SONNY LE**

I, **Sonny Le**, 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 Balboa Water Group LLC (“Balboa Water Group”) as an hourly-paid, non-exempt employee from approximately May 2016 to approximately April 2017. I decided to seek legal advice about my work experiences with Balboa Water Group and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwarzian. I wanted to do whatever I could to make sure Balboa Water Group 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 under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and a class representative.

3. I have spent over **15 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Balboa Water Group, 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 Balboa Water Group. 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 **12 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 Balboa Water Group. During the  
7 discovery phase of the litigation, I spent approximately **5 additional hours** reviewing Balboa  
8 Water Group's discovery requests, locating documents, and providing documents, responses, and  
9 supplemental responses to my attorneys.  
10

11           5.       As far as the settlement is concerned, I was available to review documents and  
12 answer any questions my attorneys had. I spent about **3 hours** reviewing the settlement agreement  
13 and about **2 hours** asking questions and discussing the potential settlement with my attorneys  
14 before signing the settlement agreement.  
15

16           6.       I believe that I have done everything that my attorneys have asked of me and have  
17 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees  
18 and the State of California. I think my efforts helped to get the result obtained in this case, and as  
19 a class representative, I respectfully request that the Court award me a service award in the amount  
20 of \$7,500.00 for my active participation in this case. Taking into consideration the time that I  
21 have dedicated to this case, I believe that this amount is reasonable.  
22

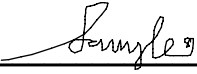
23           7.       I am not related to anyone associated with Lawyers *for* Justice, PC.  
24

25           8.       I have not entered into any undisclosed agreements, nor have I received any  
26 undisclosed compensation in this case. The only compensation I will receive is whatever amount  
27 the Court awards as a service award, as well as my share of the settlement as a class member.  
28

///  
28

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

3 Executed this 03/01/2022 day of March 2022, at Garden Grove, California.

4  2022-03-02 00:23:12 UTC - 107.185.181.251  
5 Nintex AssureSign® 75da088b-074c-4480-b908-ae4016c04e4

6 Sonny Le

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11 **LAWYERS for JUSTICE, PC**  
12 410 West Arden Avenue, Suite 203  
13 Glendale, California 91203  
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