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Attorneys for Plaintiff

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

YOHANNA SANCHEZ, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

SU CASA DE CAMBIO CESAR CHAVEZ,
INC., a California corporation, and DOES 1
through 10, inclusive,

Defendants.

Case No.: 21STCV32728

CLASS ACTION

*[Assigned for all purposes to Judge Maren
Nelson, Dept. 17]*

**DECLARATION OF YOHANNA
SANCHEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

*[Filed concurrently with: Plaintiff's Notice of
Motion and Motion for Final Approval of
Class Action and PAGA Settlement;
Memorandum of Points and Authorities;
Declarations of Justin F. Marquez and
William Argueta (Settlement Administrator)
in Support of Motion; and [Proposed] Order
Granting Motion.]*

FINAL APPROVAL HEARING

Date: December 13, 2023

Time: 9:00 a.m.

Dept: 17

Complaint filed: September 3, 2021

FAC filed: February 25, 2022

1 a class action case and acting as the Class Representative. I further understood that pursuing the
2 case as a class action, rather than individually, meant that it would take substantially longer as a
3 result of the multi-step approval process as mandated by the California Courts. Although I was
4 made aware that there was a possibility that I could receive nothing at the end, I believed that it
5 was important to ensure that Su Casa followed the law with respect to all of its hourly-paid, non-
6 exempt employees. Additionally, I understood that it was my responsibility to act in the best
7 interests of the Class and not just myself. In that respect, I understood my duties and
8 responsibilities to the proposed Class and carried out and will continue to carry out those duties as
9 necessary.

10 6. Throughout the course of the litigation, I maintained constant communication with
11 my attorneys and discussed pertinent matters relevant to the lawsuit. I asked questions when I
12 wanted to know what was being done to advance the interests of the Class or simply wanted an
13 update regarding the case. I understood that a recovery would not only benefit me but would
14 benefit my fellow coworkers as well. At all times, I made myself available to answer any questions
15 that my attorneys had about my employment. This was especially true leading up to and during
16 the mediation that took place on June 17, 2022. In preparation for the mediation, I had extensive
17 conversations with my attorneys regarding the nuanced issues that we were going to advance
18 during the negotiation process with the mediator. During the mediation session, I was available to
19 speak with my attorneys, answer any questions that arose, and provide any additional
20 documentation that was necessary to assist the settlement discussions.

21 7. On or about October 2023, I reviewed the Class Action and PAGA Settlement and
22 Class Notice ("Settlement Agreement"), and thereafter in June 2023, I reviewed the amended
23 Settlement Agreement with the Court's proposed revisions in full and discussed all the terms with
24 my attorneys. My attorneys answered all the questions I had regarding the Settlement Agreements.
25 I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength
26 of the class claims and Su Casa's defenses. I signed each version of the Settlement Agreement.

27 8. I estimate that I spent approximately 40 hours searching for and collecting
28 documents related to my employment, speaking with my attorneys throughout the litigation,

1 helping my attorneys prepare for mediation, discussing the particulars and reasonableness of the
2 settlement, and reviewing/signing documents related to the settlement.

3 9. I believe the settlement is a good settlement and I would recommend that the Court
4 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
5 had the opportunity to represent the class in this lawsuit and that I was able to recover money
6 through a settlement for the class.

7 10. I have observed my attorneys' work throughout this case. They have been thorough,
8 diligent, prompt, courteous, and professional, and I believe they are fully entitled to the award of
9 fees that they have requested for their hard work.

10 11. I did not make the decision to file a class action lightly. I was concerned by the
11 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
12 associated with a lawsuit that I filed against my former employer. I am currently employed, but I
13 am mindful that my current and prospective employers might find out that I sued Advance
14 Structural, and this could hurt my employability. Nevertheless, I felt that important rights were at
15 stake that hurt everyone, and something ought to be done about it.

16 12. I understand that the settlement agreement provides a service payment in the amount
17 of \$10,000.00 to me. I believe this amount is fair compensation for my time and effort on this case,
18 for helping to prosecute this case, and for the risks with respect to my future employment. In
19 addition, the settlement requires that I enter into a general release, which I understand is broader
20 than the release that will bind other class members.

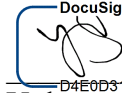
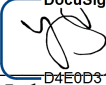
21 13. I respectfully request that the Court award me a \$10,000.00 service payment. Based
22 on my involvement in this case and the benefits provided to my former co-workers, I can say I
23 helped stand up for the other workers who were too afraid to say anything to management because
24 they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid
25 to take that risk because I strongly care about helping out my former co-workers.

26 14. I do not have any interest, financial or otherwise, in the proposed cy pres recipient,
27 Legal Aid at Work, or the third-party administrator, ILYM Group, Inc.

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

3 Executed on 11/15/2023 at Los Angeles, California.

4  DocuSigned by:
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6 D4E0D31FBFB84DA...
7 Yohanna Sanchez

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PROOF OF SERVICE

Sanchez v. Su Casa de Cambio Cesar Chavez, Inc.
21STCV32728

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Sandy S. Sespene, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is ssespene@wilshirelawfirm.com.

On November 17, 2023, I served the foregoing **DECLARATION OF YOHANNA SANCHEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Nancy N. ("Niki") Lubrano, Esq. (SBN 263037)

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Attorneys for Defendant, Su Casa de Cambio Cesar Chavez, Inc.

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

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

Executed on November 17, 2023, at Los Angeles, California.



Sandy S. Sespene