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Attorneys for Plaintiff

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

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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

*[Filed concurrently with: Plaintiff's Notice of
Motion and Motion for Preliminary Approval
of Class Action Settlement, Memorandum of
Points and Authorities; Declarations of Justin
F. Marquez and Jarrett Gorlick in Support of
Plaintiff's Motion for Preliminary Approval
of Class Action Settlement; and [Proposed]
Order Granting Plaintiff's Motion for
Preliminary Approval of Class Action
Settlement]*

PRELIMINARY APPROVAL HEARING

Date: March 10, 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.

16 7. This was especially true leading up to and during the mediation that took place on
17 June 17, 2022. In preparation for the mediation, I had extensive conversations with my attorneys
18 regarding the nuanced issues that we were going to advance during the negotiation process with
19 the mediator. During the mediation session, I was available to speak with my attorneys, answer
20 any questions that arose, and provide any additional documentation that was necessary to assist the
21 settlement discussions.

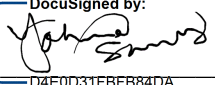
22 8. On or about October 18, 2022, I reviewed the Class Action and PAGA Settlement
23 Agreement and Class Notice (“Settlement” or “Settlement Agreement”) in full and discussed all
24 the terms with my attorneys. My attorneys answered all the questions I had regarding the
25 Settlement Agreement. I believe the settlement terms and allocations are fair, adequate, and
26 reasonable given the strength of the class claims and Su Casa’s defenses. That same day, I signed
27 the Settlement Agreement.

28 9. I estimate that I spent approximately 40 hours searching for and collecting

documents related to my employment, speaking with my attorneys throughout the litigation, helping my attorneys prepare for mediation, discussing the particulars and reasonableness of the settlement, and reviewing/signing documents related to the settlement.

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

Executed on 11/2/2022 at [city], California.

DocuSigned by:

D4E0D31FBFB84DA...
Yohanna Sanchez

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Los Angeles, CA 90010-1137

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 sspene@wilshirelawfirm.com.

On **November 2, 2022**, I served the foregoing **DECLARATION OF YOHANNA SANCHEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY 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:

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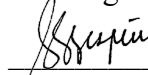
Attorneys for Defendant, Su Casa de Cambio Cesar Chavez, Inc.

(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 2, 2022, at Los Angeles, California.



Sandy S. Sespene