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Attorneys for Plaintiff John Jadelrab on behalf of himself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

JOHN JADELRAH, on behalf of himself and
all “aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

Plaintiffs,

v.

CCFI, LLC, a Delaware limited liability
company, and DOES 1 through 10, inclusive,

Defendants.

CASE NO: 22-CIV-00064

Assigned to the Hon. Marie S. Weiner, Dept. 2

**DECLARATION OF JOHN JADELRAH
IN SUPPORT OF UNOPPOSED MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004,
AWARDING ATTORNEYS’ FEES,
COSTS, SERVICE AWARD, AND
REIMBURSEMENT OF SETTLEMENT
ADMINISTRATION EXPENSES**

Date: January 31, 2023

Time: 2:00 PM

Dept.: 2

Complaint Filed: January 6, 2022

Trial Date: None

1 I, JOHN JADEL RAB, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendant CCFI, LLC
3 (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion
4 For An Order Approving Settlement Of Claims Brought Pursuant To The Private
5 Attorneys General Act Of 2004, Awarding Attorneys’ Fees, Costs, Service Award, And
6 Reimbursement Of Settlement Administration Expenses. I am a competent adult and
7 worked for Defendant as a non-exempt employee during the relevant time period. I have
8 personal knowledge of the facts set forth herein, and if called as a witness to testify to
9 them, I could and would do so competently.

10 2. I contacted my current attorneys when I questioned the employment
11 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to
12 act as a representative on behalf of other employees of Defendant in this action whom I
13 believed were being subjected to labor law violations. I pursued this case on a
14 representative basis so that I could help other employees recover for what I believed were
15 Defendant’s improper practices.

16 3. Specifically, I questioned Defendant’s policies of failing to pay by an
17 instrument payable on demand and without discount, provide legally compliant meal and
18 rest periods, or compensation in lieu thereof, issue accurately itemized wage statements,
19 and pay certain PAGA Members all wages due at the separation of their employment.
20 Through many discussions with my lawyers, I learned these may be illegal practices and
21 Defendant’s employees might have recourse for them.

22 4. By bringing this lawsuit, and throughout its course, I have put the interests
23 of other employees ahead of my own. I understood that I could possibly earn an incentive
24 award if this case resolved itself favorably, but I also knew that I could also be responsible
25 for paying Defendant’s attorneys’ fees and costs if it did not.

26 5. My goal in bringing this lawsuit was to obtain a recovery on behalf of all
27 employees of Defendant, and even more importantly, to put an end to what I believed
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1 were illegal practices on the part of Defendant. I believe I have achieved both through
2 this lawsuit and settlement.

3 6. I am very happy about the results of this litigation. I am satisfied that
4 Defendant is compensating other PAGA Members and the State for penalties that I believe
5 we are due.

6 7. At the onset of this case, I spent time through numerous phone calls with
7 several of my attorneys explaining what I understood to be Defendant's policies and
8 practices and how they were applied to other employees. I kept actively involved with the
9 status of this case throughout the litigation process, tracking the status of the case and
10 participating as much as possible.

11 8. While I have not maintained detailed time records of my activities in
12 connection with this litigation, I believe that I have spent a total of approximately 15-20
13 hours assisting my attorneys with the preparation of this case and doing work and
14 investigation of the facts independent from my attorneys both before and during this case.

15 9. Before this litigation commenced, and throughout its course, I spent
16 approximately 3-4 hours gathering, organizing, and reviewing documents and information
17 for this lawsuit. I sifted through many of my own documents and reviewed information
18 produced by Defendant as part of this litigation.

19 10. I communicated with my attorneys several times per month to track my
20 case's status. I have taken an active involvement in this matter throughout its course.

21 11. Taking the initiative with this case was very risky for me, both
22 professionally and financially. I put principal first and took a tremendous risk by filing
23 this lawsuit. I am quite confident that pursuing this lawsuit will result in future
24 reputational harm to me. There is a stigma associated with suing one's former employer.
25 I suspect I may be adversely affected when it comes to obtaining future employment –
26 employers who discover that I sued Defendant in a representative action will likely avoid
27 hiring me.
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I declare, under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 12 / 29 / 2022 at Millbrae, California.



JOHN JADEL RAB