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Attorneys for Plaintiff,
Ricardo Pantoja And Proposed Class Counsel

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

RICARDO PANTOJA, on behalf of himself
and all others similarly situated;

Plaintiff,

v.

SOUTH BAY SAFETY, INC., a California
Corporation; ACME FURNITURE
INDUSTRY, INC., a California Corporation,
and DOES 1 through 50 inclusive,

Defendants.

CASE NO: 21STCV38848

*Assigned to the Hon. Carolyn B. Kuhl, Dept.
SS12*

CLASS ACTION

**DECLARATION OF RICARDO
PANTOJA IN SUPPORT OF
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DATE: July 23, 2024

TIME: 10:30 a.m.

DEPT.: SSC-12

Action Filed: October 21, 2021

1 I, RICARDO PANTOJA, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Defendants South Bay
3 Safety, Inc. ("South Bay") and Acme Furniture Industry, Inc. ("Acme") (together,
4 "Defendants") and I submit this declaration in support of Plaintiff's Unopposed Motion
5 for Preliminary Approval of Class Action Settlement. I am a competent adult and
6 worked for South Bay and was placed at Acme's workplace as a non-exempt employee
7 in Los Angeles County during the relevant time period. I have personal knowledge of
8 the facts set forth herein, and if called as a witness to testify to them, I could and would
9 do so competently.

10 2. I contacted Jake Finkel's office when I questioned the employment
11 practices of Defendants prior to commencing this lawsuit. I accepted the opportunity to
12 act as a Class Representative in a class action on behalf of other employees of
13 Defendants who I believed were being subjected to labor law violations. Although
14 presented with the opportunity, I did not to pursue this case on an individual basis and
15 instead did so as a class action so that I could help other employees recover for what I
16 believed were Defendants' illegal practices.

17 3. Specifically, I questioned Defendants' policies of failing to pay all wages,
18 failing to provide all meal and rest periods, failing to timely compensate employees
19 upon separation, and issuing its employees deficient wage statements. Through
20 discussions with my lawyers, I learned these may be illegal practices and Defendants'
21 employees might have recourse for them.

22 4. By bringing this lawsuit, and throughout its course, I have put the interests
23 of the class ahead of my own. I understood that I could possibly earn a small
24 enhancement payment if this case resolved itself favorably, but always knew that I could
25 also be responsible for paying Defendants' attorneys' fees and costs if it did not. My
26 goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and even
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1 more importantly, to put an end to what I believed were illegal practices on the part of
2 Defendants. I believe I have achieved both through this lawsuit and settlement.

3 5. I am very happy about the results of this litigation. I am satisfied that
4 Defendants are compensating class members for unpaid wages, premium wages for
5 missed meal and rest periods, penalties, and interest that I believe we are due.

6 6. At the onset of this case, I spent time through phone calls with several of
7 my attorneys explaining what I understood to be the policies and procedures of
8 Defendants and how they were applied to me and others I worked with. During the
9 course of this litigation, up through and following the settlement process, I kept actively
10 involved with its status, tracking the status of the case and participating as much as
11 possible.

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

16 8. Before this litigation commenced, and throughout its course, I have spent
17 approximately 5 or more hours gathering, organizing, and reviewing documents and
18 information for this lawsuit.

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

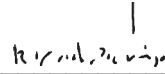
21 10. This lawsuit will almost certainly result in reputational harm to me. There
22 is a stigma associated with suing anyone, let alone your former employer. I will
23 probably be adversely affected when it comes to obtaining future employment –
24 employers who learn that I sued Defendants in a class action will likely avoid hiring me.

25 11. I do not believe that I have any conflicts with other members of the class.
26 My interests in bringing this lawsuit – for Defendants to change their labor practices
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1 going forward and to compensate current and former employees – are the same as those
2 of all other class members.

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

5 Executed on this ^{05 / 01 / 2024} day of May, 2024 at Rosemead, California.

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9 RICARDO PANTOJA
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