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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

MANUEL SALCEDO, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

MAJCO, INC., a California corporation;
MAJCO, LLC, a California limited liability
company; BIG BRAND TIRES & SERVICES,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 56-2021-00551487-CU-OE-VTA

Honorable Benjamin Coats
Department 43

CLASS ACTION

**DECLARATION OF MANUEL
SALCEDO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for
Final Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Edwin Aiwazian); Declaration of
Settlement Administrator (Jarrod Salinas);
and; [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: March 23, 2023
Time: 8:30 a.m.
Department: 43

Complaint Filed: March 3, 2021
FAC Filed: November 7, 2022
Trial Date: None Set

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1 spent at least 10 additional hours speaking with my attorneys about the case, identifying potential
2 witnesses, providing my attorneys with documents and information concerning the case, and also
3 describing policies, practices, and procedures of Majco.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about 6 hours reviewing the
6 settlement agreement and about 6 hours asking questions and discussing the potential settlement
7 with my attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
10 and the State of California. I think my efforts helped to get the result obtained in this case, and as
11 a class and PAGA representative, I respectfully request that the Court award me an
12 enhancement payment in the amount of \$7,500.00 for my active participation in this case.
13 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
14 reasonable.

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

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement award, as well as my share of the settlement as a class
19 member and as an aggrieved employee.

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

22 Executed this ^{08/29/2022} day of August 2022, at Ventura, California.

23 Electronically Signed 2022-08-29 19:22:09 UTC - 174.193.143.100

Nintex AssureSign® 8853ba6d-e42b-459f-9d54-df00013e3468

24 Manuel Salcedo