

James R. Hawkins (SBN 92925)
 Gregory Mauro (SBN 222239)
 Michael Calvo (SBN 314986)
 Ava Issary (SBN 342252)
 Lauren Falk (SBN 316893)
JAMES HAWKINS APLC
 9880 Research Drive, Suite 200
 Irvine, California 92618
 Tel: (949) 387-7200 / Fax: (949) 387-6676

Attorneys for Plaintiff Miguel Chavarin

Edwin Aiwazian (SBN 232943)
 Arby Aiwazian (SBN 269827)
 Joanna Ghosh (SBN 272479)
 Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
 410 West Arden Avenue, Suite 203
 Glendale, California 91203
 Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Christian Rojas Cruz

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CHRISTIAN ROJAS CRUZ individually, and
 on behalf of other members of the general
 public similarly situated;

Plaintiffs,

vs.

SENSOR SYSTEMS INC., a California
 corporation; and DOES 1 through 100,
 inclusive,

Defendants.

Case No.: 21STCV25102

Honorable Yvette M. Palazuelos
 Department SSC9

DECLARATION OF MIGUEL CHAVARIN IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date: April 5, 2023
 Time: 10:00 a.m.
 Dept.: SSC9

Action Filed: July 8, 2021
 Trial Date: None Set

DECLARATION OF MIGUEL CHAVARIN

I, MIGUEL CHAVARIN, declare as follows:

1. I am over the age of eighteen. I submit this Declaration in support of the concurrently filed Motion for Preliminary Approval of the parties' settlement agreement. The following is based upon my personal knowledge, and if called as a witness, I could and would competently testify regarding the statements in this Declaration.

2. I am currently a resident of Pacoima, California. I worked for Defendant Sensor Systems Inc., ("Defendant) from approximately August 2018 as a non-exempt employee with the title of Janitor until my separation from Defendant's employ in approximately March 2021. During the Settlement Class Period, my job duties and responsibilities were the same as other non-exempt employees employed by Defendant in California.

3. Prior to filing this lawsuit, I searched for an attorney and found James Hawkins, APLC. I never knew James Hawkins, APLC before my consultation with them. After my consultation, I asked them to represent me in bringing a class action on behalf of myself and all other similarly situated non-exempt employees of Defendant.

4. I knew the actions complained of in the complaint not only happened to me but happened to the other employees of Defendant that I worked with. I wanted to help the other non exempt workers vindicate their rights, so I decided to bring the lawsuit that we filed on or about November 18, 2021.

5. I believe my situation is similar and has been similar to all other non-exempt employees like me who worked for Defendant during the class period. The complaint which I brought against Defendant alleges claims on a class and representative basis for the failure to pay wages including overtime under California labor laws, failure to provide lawful meal and rest periods, failure to timely pay wages, failure to provide accurate itemized wage statements, unfair business practices, and violations of the Private Attorneys' General Act. I believe my claims are typical of the other Class Members and I can represent our common claims because I believe Defendant applied the same policies, practices and schedules for us all and treated me and all Class Members similarly throughout the class period and in California.

1 6. I believe that my interests have been and continue to be in alignment with the
2 Class Members, and I am willing to continue to pursue and prosecute their class and
3 representative claims against Defendant in this litigation. I believe I do not have any interests
4 which are against the interests of the Class Members, and I will continue to do what is best for all
5 the Class Members rather than myself, as I have done from the beginning of this case.

6 7. My relationship with James Hawkins, APLC is purely an attorney client
7 relationship and there are no other business, familial or social relationships between my attorney
8 and myself. In addition, I do not have any relationship with Defendant other than being a former
9 employee of Defendant. For these reasons, there is no conflict of interest between myself, my
10 attorney, between Defendant, and myself or between the Class. and myself

11 8. As the Class Representative in this case, I participated in every aspect of the
12 litigation and have been apprised of its progress. I believe I have maintained the best interests of
13 the Class Members while performing my Class Representative duties, and I participated in many
14 interviews and conferences with class counsel regarding the conduct and settlement of this matter.
15 I prepared for my deposition, although one was not taken because we settled the case, I have
16 spoken with several other Class Members and provided information regarding their claims to my
17 counsel in support of proving the class claims and establishing what happened to us as a group of
18 employees.

19 9. My counsel has informed me that this information, along with the details and
20 support I provided for my class claims, were very important in convincing Defendant to negotiate
21 the settlement now before the Court for approval. I have also provided many documents to class
22 counsel in support of the class claims, have helped my attorneys with preparing written questions
23 and what documents to ask for, and I have invested a lot of time and effort in performing my
24 duties on behalf of the Class. I also conducted numerous meetings with my counsel to prepare for
25 and discuss Defendant's information requests in advance of the mediation.

26 10. After reviewing the settlement agreement and speaking with my counsel about it,
27 I agreed to sign it on behalf of myself and all the other Class Members. I signed the settlement
28 because I believe the Settlement obtained in this case on behalf of the Class is very fair,

1 sufficient, and reasonable in view of the facts I know and have been made aware of, and due to
2 the risk of going through further litigation. I believe the average payouts for the class members
3 are very reasonable considering all the facts and evidence and risks moving the case forward to
4 trial.

5 11. I have not received and understand I will not receive any consideration or promises
6 that are different from any of the other Class Members will receive under the Settlement. I
7 understand this is because all Settlement Class Members who do not ask to be excluded will
8 receive individual settlement payments under the formulas in the settlement agreement, which I
9 understand to be fair.

10 12. I also understand and believe to be fair the settlement allocation formula and
11 believe it fairly accounts for the individual settlement payments based on the strengths and
12 weaknesses of the various alleged claims and also considering the individual compensation and
13 pay rates for the various class members over the settlement period.

14 13. I also understand my counsel will request that I be awarded an enhancement
15 payment of \$10,000 for my efforts as Class Representative, and that this additional payment is not
16 guaranteed, but must be approved by the Court. I believe the requested enhancement payment is
17 fair and reasonable based upon the results we have achieved for the Class Members and because
18 of the tasks I have performed on their behalf, including:

19 • Compiling many documents for my attorneys;
20 • Reviewing documents with my attorneys;
21 • Conducting preparation with my attorneys and participating in responding to information
22 for mediation and to informal discovery requests;
23 • Participating in telephone conferences with my attorneys and their representatives; and
24 • Participating in the preliminary approval and eventual final approval process with class
25 counsel and reviewing and signing related documents.

26 14. I estimate that I have spent approximately 25 hours helping to prosecute this
27 matter.
28

16. I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on this 4th day of October 2022 at Pacoima, California.

Miguel Chavarin