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Attorneys for Plaintiff ARATH RODRIGUEZ, Individually, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

ARATH RODRIGUEZ, Individually, and
on behalf of other members of the general
public similarly situated

Plaintiff

v.

ANV INVESTMENTS, INC., a California
Corporation and DOES 1-10, inclusive.

Defendants.

CASE NO. 37-2022-00006121-CU-OE-CTL

**DECLARATION OF ARATH
RODRIGUEZ IN SUPPORT OF
PLAINTIFF'S *UNOPPOSED* MOTION
FOR FINAL APPROVAL OF (1) CLASS
ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and
(3) CLASS REPRESENTATIVE AWARD**

Date: January 12, 2024

Time: 9:00 a.m.

Judge: Hon. Eddie C. Sturgeon

Dept.: C-67

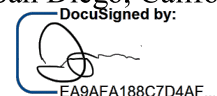
1 I, ARATH RODRIGUEZ, declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter.
- 3 2. I make this declaration in support of Plaintiff's Unopposed Motion for Final Approval of
- 4 (1) Class Action Settlement; (2) Attorneys' Fees and Costs; and (3) Class Representative
- 5 Award. I am personally familiar with the facts set forth in this declaration, and if called to
- 6 testify could and would do so.
- 7 3. To my recollection, I personally met with my Attorneys in person on several occasions.
- 8 4. During these meetings, I would review and explain documents turned over by Defendants from
- 9 my employment. I would also explain my (as well as others') role during work. I also helped
- 10 identify numerous other employees who could support the claims I was making in this lawsuit.
- 11 5. I also spoke with my attorneys on the phone on at least 15 other occasions.
- 12 6. I also spent significant time reviewing the settlement documentation and discussing the
- 13 settlement with my attorneys.
- 14 7. In total, I estimate that I spent at least 30 hours related to the above mentioned tasks directly
- 15 working with my attorneys. I also spent at least another 8-10 hours of my own time gathering
- 16 evidence and outlining issues that I later shared with my attorneys.
- 17 8. When I decided to move forward with this case, I was counseled by my attorneys of the
- 18 potential stigma of being a Class Representative in a class action dispute, as this is a publicly
- 19 filed lawsuit.
- 20 9. I was also advised when I brought this case that had we lost, I could have been personally
- 21 liable for paying all of Defendant's costs. I was further advised this could be well into the tens
- 22 of thousands of dollars on this type of case.
- 23 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
- 24 working for the ANV Investments, Inc.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing

26 12/16/2023

27 is true and correct. Executed this day of December, 2023, at San Diego, California.

28  DocuSigned by:
EA9AFA188C7D4AF...

ARATH RODRIGUEZ