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Attorneys for Plaintiff GABRIELA GUEVARA,
on behalf of herself, all others similarly situated,
and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

GABRIELA GUEVARA on behalf of
herself, all others similarly situated, and on
behalf of the general public,

Plaintiffs,

v.

AGUILASMORALES, INC.; and DOES 2-
100,

Defendants.

Case No. 21STCV47592

[Related to Case No. 22STCV08424]

DECLARATION OF PLAINTIFF
GABRIELA GUEVARA IN SUPPORT OF
SETTLEMENT APPROVAL

1 I, GABRIELA GUEVARA, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I
6 submit this declaration in support of settlement approval.
- 7 3. I worked for AguilasMorales, Inc. (“AguilasMorales”) as a non-exempt, hourly employee
8 during the Class Period.
- 9 4. Since becoming a class representative, I diligently worked on this case. I always answered
10 phone calls from my attorneys or called them back promptly when they called. I also
11 promptly responded to emails sent by my attorneys. On many occasions, I spoke with my
12 attorneys for case related purposes. At the beginning of the case, I searched for and
13 provided my attorneys with documents I received from AguilasMorales, such as wage
14 statements and other documents I received during my employment. I assisted my attorneys
15 in investigating the case. I have worked diligently to help progress the case.
- 16 5. I was aware that, at some point in this case, I would have my deposition taken. I knew that
17 the deposition could take a full day and that I may have to meet with my attorneys prior
18 to my deposition. I was at all times ready and willing to sit for my deposition.
- 19 6. Although I did not attend the mediation in person, I was available on the phone for all the
20 negotiations, which I was kept apprised of and assisted in. I gave my consent to settle with
21 AguilasMorales for the gross settlement amount of \$350,000. I completely and carefully
22 reviewed the settlement agreement. I then signed the settlement agreement.
- 23 7. I estimate that I spent approximately 27 hours in prosecuting this case.
- 24 8. In light of the work I performed in this case and the duties associated with being a class
25 representative in a case of this magnitude, I believe the \$7,500 service payment award is
26 reasonable. I understand that this additional service award is not guaranteed and is subject
27 to Court approval.

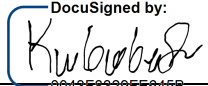
1 9. I have and will continue to adequately represent all of the interests of the class. With my
2 status as class representative, I will treat the interests of the Class above my interests.

3 10. My claims are typical of the Class Members because I am similarly situated to all
4 individuals who worked for Aguila Morales as non-exempt hourly employees in California
5 at any time between December 30, 2017 through September 19, 2023. Thus, my interests
6 are the same as all members of the proposed Class.

7 11. I recognize that any resolution of this matter must be approved by the Court in terms of
8 whether the settlement is fair and reasonable, and that I am obligated to protect the
9 interests of all of Class Members for the Class Period.

10 I declare under penalty of perjury under the laws of the State of California that all the
11 foregoing is true and correct.

12 Dated: 10/30/2023

13 By: 
14 GABRIELA GUEVARA
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