

JAMES HAWKINS APLC

James R. Hawkins (#192925)

Gregory Mauro (#222239)

Michael Calvo (#314986)

Lauren Falk (#316893)

Ava Issary (#342252)

9880 Research Drive Suite 200

Irvine CA 92618

Tel.: (949) 387-7200

Fax: (949) 387-6676

Email: James@jameshawkinsaplc.com

Email: Greg@jameshawkinsaplc.com

Email: Michael@jameshawkinsaplc.com

Email: Lauren@jameshawkinsaplc.com

Email: Ava@jameshawkinsaplc.com

Attorneys for Plaintiff BEATRIZ F. MATA LOPEZ,
individually and on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

BEATRIZ F. MATA LOPEZ, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

CULMIN STAFFING GROUP, INC., a
Delaware Corporation; EMPLOYERS HR
LLC, a Florida Limited Liability Company;
STG LOGISTICS, INC., a California
Corporation; and DOES 1-50, inclusive,

Defendants.

CASE NO.: 21STCV45423

Assigned For All Purposes To:
Judge: David S. Cunningham
Dept.: 11

**DECLARATION OF PLAINTIFF
BEATRIZ F. MATA LOPEZ IN SUPPORT
OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
SETTLEMENT**

Date: February 13, 2025
Time: 10:00 AM
Dept.: 11

DECLARATION OF BEATRIZ F. MATA LOPEZ

I, BEATRIZ F. MATA LOPEZ hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the Plaintiff's Motion for Preliminary Approval of Class Action Settlement. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendants CULMIN STAFFING GROUP, INC. and STG LOGISTICS, INC. ("Defendants") in April 2019 as a Non-Exempt Employee with the title of Overage Shortages and Damages and Accounting and worked during the liability period for Defendants until my separation from Defendants' employ in approximately April 2021. My duties included but were not limited to the reviewing of tallies where warehouse workers entered in the crate that was received in the containers, entering information into company system, communicating with customers regarding damage or discrepancies, billing and accounts payable and receivables.

3. As a non-exempt employee, I suffered the same damages as other employees. These included not being paid all my wages, not provided accurate wage statements, not provide with meal and rest periods, not paid timely during my employment, not reimbursed for necessary business expenses, not paid reporting time pay, issued payment of wages in the form of a non-Labor Code-compliant instrument, subjected to improper use of my consumer credit report, and not timely paid wages upon my separation from Defendants' employ all in accordance with California law. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendants and suffered similar harms due to Defendants' common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences

1 about the factual bases for the claims that I wanted to pursue against Defendants. During those
2 conferences, my attorneys provided me with an overview of how those claims would be litigated
3 and generally educated me about the nature of complex/representative litigation and my role as
4 the representative Plaintiff.
5

6 6. My attorneys provided me with a draft of the complaint for my review and
7 approval. I closely reviewed the complaint to ensure accuracy and completeness. As a
8 result, I caused my attorneys to file the class action complaint alleging claims for the allegations
9 alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the
10 complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly
11 contacted my attorneys to stay current on the status of the litigation, and to discuss my
12 attorneys' progress in prosecuting the claims.

13 7. Since I believe I was not accurately paid wages, not timely paid wages during my
14 employment, and therefore not provided accurate itemized wage statements, not provided meal
15 and rest periods, not reimbursed for necessary business expenses, issued payment of wages in
16 the form of a non-Labor Code-compliant instrument, and not provided with all wages earned
17 and owed upon my separation from employment, I believe that I have been similarly injured as
18 to all other class members in the settlement who worked for Defendants during the class period.
19 I believe the claims asserted in the Complaint are also shared by the other Class Members. I
20 worked with various other non-exempt employees, and I believe we were all treated the same
21 and subject to the same unlawful policies.

22 8. On December 13, 2021, I, through my attorneys, filed this action against
23 Defendants for Defendants' alleged: failure to pay minimum and overtime wages, failure to
24 provide meal periods, failure to provide rest periods, failure to pay all wages earned and owed
25 upon separation from Defendants' employ, failure to pay wages timely during employment,
26 failure to provide accurate itemized wage statements, failure to reimburse necessary business
27 expenses, and issuing payment of wages in the form of a non-labor code-compliant instrument,
28 and violation of Business & Professions Code section 17200, et seq.

9. On February 18, 2022, I, through my attorneys, filed a separate PAGA

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2 Representative Complaint Pursuant to the Private Attorneys General Act alleging that
3 Defendants violated Labor Code sections 201, 201.3, 201.5, 201.6, 201.9, 202, 203, 212, 213,
4 226, 226.3, 226.7, 246, 510, 512, 558, 1174, 1174.5, 1175, 1194, 1197, 1197.1, 1198, 17200,
5 2698, 2699, 2802, pursuant to Labor Code section 2699.

6 10. Since I agreed to become a Class Representative, I have worked every step of the
7 way with my attorneys. During the course of the litigation, I have always kept the best interest
8 of the Class Members on equal footing as mine. I have been, and I am willing to continue to
9 pursue the Class Members' claims vigorously on our collective behalf if the Settlement is not
10 finally approved. As a result, I firmly believe that I do not have any interests adverse to the
11 interests of the Class Members. I have maintained the Class Members best interest from the
12 inception of the case.

13 11. As the Class Representative, I have spent numerous hours consulting with my
14 attorneys, providing documentation, consulting with other Class Members, responding to
15 questions by my attorneys, providing documents to my attorneys, working with my attorneys to
16 review documents received, helping my attorneys in preparing for the mediation and attending
17 the mediation via telephone. I was consulted about the status of the case and provided constant
18 feedback about the case from my attorneys including the mediation, settlement negotiations and
19 eventual settlement. I estimate I have spent approximately 41 hours working on this case.

20 12. From the beginning of this case, I have freely chosen to accept the risks of
21 being the Class Representative in this class action lawsuit. I chose to assume these risks and
22 pursue the claims on behalf of the Class Members as I wanted to vindicate their rights. I believe
23 we have achieved that result with the settlement and the individual payments to the Class
24 Members. I believe the settlement is fair reasonable and adequate based on the numerous
25 defenses asserted by Defendants. I believe the efforts and work I put forth helped to achieve the
26 fair settlement that will benefit the Class Members. As a result of my efforts, I also believe the
27 Class Representative Service Payment is reasonable, and I respectfully request the Court
28 approve the amount of \$10,000.00 as fair and reasonable.

I declare under penalty of perjury under the laws of the state of California that the

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foregoing is true and correct. Executed on October 8, 2024, at Los Angeles, California.

DocuSigned by:

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BEATRIZ F. MATA LOPEZ