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Attorneys for Plaintiff LUCIO MENJIVAR

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

ANGEL RODRIGUEZ, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

AMERICAN TEXTILE MAINTENANCE, a
California corporation; and DOES 1 through 25,
inclusive,

Defendants.

LUCIO MENJIVAR, on behalf of himself and
all other aggrieved employees,

Plaintiff,

v.

AMERICAN TEXTILE MAINTENANCE
COMPANY, a California corporation d/b/a/
REPUBLIC MASTER CHEFS TEXTILE
RENTAL SERVICES, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 22STCV17855 (Lead)
(Consolidated with Case No.
22STCV10611)

*Assigned for all purposes to the
Honorable Elaine Lu, Dept. 9*

**SUPPLEMENTAL DECLARATION OF
RANA NADER IN SUPPORT OF NOTICE
OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: December 4, 2024
Time: 9:00 a.m.
Place: Department 9

Menjivar Complaint Filed: March 28, 2022

DECLARATION OF RANA NADER

I, Rana Nader, declare:

1. I am an attorney duly authorized and licensed to practice law before all courts in the State of California. I am a partner of Proxy Law Firm, LLP, counsel of record for Plaintiff Lucio Menjivar's ("Plaintiff"), on behalf of himself and all other aggrieved employees in this action. I submit this Supplemental Declaration in support of Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement. Defendant American Textile Maintenance Company doing business as Republic Master Chefs ("American Textile" or "Defendant") does not oppose this Motion. I am familiar with the factual background, procedural history, files, pleadings, discovery, and communications in this matter. Unless stated on information and belief, I make this declaration of my own personal knowledge and if called to testify, I could and would so competently on the basis of my own personal knowledge or information and belief.

2. Proxy Law Firm has entered into written fee splitting agreements with Blackstone APC and Lavrac Accident Law. Plaintiff Menjivar has agreed to and approved the aforementioned fee-splitting agreements in writing with both law firms as set forth in Plaintiff Menjivar's Amended Declaration in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement ¶10.

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

Executed on October 24, 2024 at Los Angeles, California.



Rana Nader