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Attorneys for Plaintiff

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

FRANCISCO CHAVEZ, individually, and on
behalf of other members of the general public
similarly situated and other aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiffs,

v.

AMERICAN PAPER AND PLASTICS,
INC., an unknown business entity; and DOES
1 through 100, inclusive,

Defendants.

Case No. 21STCV07182

Honorable Elihu M. Berle
Department 6

CLASS ACTION

**DECLARATION OF FRANCISCO
CHAVEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class and
Representative Action Settlement;
Declaration of Proposed Class Counsel
(Brian St. John); and [Proposed] Order filed
concurrently herewith]

Date: January 9, 2023
Time: 9:00 a.m.
Department: SSC6

Complaint Filed: February 24, 2021
FAC Filed: August 9, 2021
Trial Date: None Set

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1 documents as I could. I spent at least 10 additional hours speaking with my attorneys about the
2 case, identifying potential witnesses, providing my attorneys with documents and information
3 concerning the case, and also describing policies, practices, and procedures of American Paper &
4 Plastics.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I spent about 3 hours reviewing the settlement
7 agreement and about 2 hours asking questions and discussing the potential settlement with my
8 attorneys before signing the settlement papers.

9 6. I believe that I have done everything that my attorneys have asked of me and have
10 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
11 and the State of California. I think my efforts helped to get the result obtained in this case, and
12 as a class and PAGA representative, I respectfully request that the Court award me an incentive
13 award in the amount of \$7,500.00 for my active participation in this case. Taking into
14 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

15 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

16 8. I have not entered into any undisclosed agreements, nor have I received any
17 undisclosed compensation in this case. The only compensation I will receive is whatever amount
18 the Court awards as an enhancement award, as well as my share of the settlement as a class
19 member and as an aggrieved employee.

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

22 Executed this ^{11/08/} day of November 2022, at Covina, California.

23  Electronically Signed 2022-11-08 22:28:26 UTC - 172.58.28.255
Nintex AssureSign® cbb533d6-c556-4742-bb68-d64701644b04

24 Francisco Chavez