

Edwin Aiwarzian (SBN 232943)
edwin@calljustice.com
Arby Aiwarzian (SBN 269827)
arby@calljustice.com
Joanna Ghosh (SBN 272479)
joanna@calljustice.com
Yasmin Hosseini (SBN 326399)
yasmin@calljustice.com
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Telephone: (818) 265-1020 / Fax: (818) 265-1021

S. Emi Minne (SBN 253179)
emi@parkerminne.com
Jill J. Parker (SBN 274230)
jill@parkerminne.com
PARKER & MINNE, LLP
700 South Flower Street, Suite 1000
Los Angeles, California 90017
Telephone: (310) 882-6833 / Fax: (310) 889-0822

Attorneys for Plaintiff
NADIA ESTRADA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

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

Plaintiff,

vs.

BELSHIRE ENVIRONMENTAL SERVICES,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 30-2022-01262282-CU-OE-CXC

*Assigned for all purposes to the Honorable Lon
F. Hurwitz, Dept. CX103*

**DECLARATION OF NADIA ESTRADA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: March 22, 2024
Time: 1:30 p.m.
Dept.: CX103

Complaint Filed: May 31, 2022
Trial Date: Not Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, Nadia Estrada, declare as follows:

1. I am over 18 years of age. I am the named plaintiff in *Nadia Estrada v. Belshire Environmental Services, Inc.*, Orange County Superior Court Case No. 30-2022-01262282-CU-1. I have personal knowledge of the facts stated herein and if called as a witness I could competently testify thereto.

2. I make this declaration in support of Plaintiff's Motion for Final Approval of Class and PAGA Settlement.

3. I am a former employee of Defendant Belshire Environmental Services, Inc. (hereinafter "Defendant"). I was employed by Defendant as an hourly-paid, non-exempt designated operator from approximately February 18, 2021 to September 9, 2021.

4. After my employment with Defendant ended, I reached out to my attorneys at Lawyers for Justice, PC to discuss my employment with Defendant and the ways I believed I had been undercompensated during my employment. I wanted to take steps to make sure that Defendant was held accountable for not paying its employees properly. I spent several hours discussing my experiences working for Defendant with the attorneys at Lawyers for Justice, PC, as well as complex wage and hour class actions and representative actions under the Labor Code and the Attorney Generals Act and what it meant to be a named plaintiff and class and PAGA representative. After speaking with my attorneys, I agreed to serve as a class and PAGA representative in this action.

5. As part of becoming a class representative, I understood that I have a fiduciary duty to the potential class. My duties were explained to me by my attorneys. I understood that in representing the interests of other class members, I must put the interests of the class above my personal interests in this case. I was also aware that serving in this role required me to monitor the progress of the lawsuit, to provide all relevant facts to assist my attorneys with the case, and to actively participate in the case as necessary. I understood that it was my duty and responsibility to vigorously prosecute this case to obtain the best possible recovery for the other class members, and that I would have additional duties and responsibilities, such as responding to written

1 discovery, having my deposition taken, and traveling and participating in the case when need. I
2 understood that I might have to miss time from work in order to perform these duties. I still agreed
3 to serve as class representative in order to recover unpaid wages for Labor Code violations
4 suffered by myself and other employees.

5 6. Throughout the course of the case, I have spent a significant amount of time
6 meeting with my attorneys regarding the case and fulfilling my responsibilities as a class
7 representative. Specifically, I estimate that I have devoted at least 18 hours of my time to this
8 case, including but not limited to the following tasks: (a) initial consultations with Lawyers for
9 Justice, PC regarding my potential claims against Defendant and my duties as a potential class
10 and PAGA representative; (b) conducting my own independent research regarding wage and hour
11 class action and PAGA lawsuits and employment law firms; (c) participating in numerous lengthy
12 meetings, telephone calls and other communications with my attorneys at Parker & Minne, LLP
13 and Lawyers for Justice, PC throughout the course of the litigation regarding Defendant's
14 policies, practice, procedures, and operational structure, Class Members' job duties, and my own
15 personal experiences working for Defendant; (d) gathering documents pertaining to my
16 employment with Defendant at the request of my attorneys; (e) reviewing documents with my
17 attorneys and answering their questions; (f) helping my attorneys develop a strategy regarding the
18 documents and information needed to establish the claims alleged in the case; (g) providing
19 information regarding potential witnesses to my attorneys; (h) regularly checking in with my
20 attorneys to monitor the status of the case; (i) making myself available throughout the day of the
21 mediation and providing my attorneys with additional information during the mediation; (j)
22 reviewing the both the Joint Stipulation of Class Action and PAGA Settlement and the Amended
23 Joint Stipulation of Class Action and PAGA Settlement ("Settlement" or "Settlement
24 Agreement") and extensively discussing their terms with my attorneys; (k) reviewing and
25 discussing my declaration in support of the Motion for Preliminary Approval with my attorneys;
26 (l) contacting my attorneys to monitor the status of the administration of the Settlement following
27 preliminary approval; (m) reviewing and discussing this declaration in support of the Motion for
28 Final Approval with my attorneys.

1 7. Throughout the course of the litigation, I have made sure that I understood
2 everything that was going on in the case so I could make the best decisions on behalf of myself
3 and the Class Members. I will continue to actively participate in this lawsuit and monitor the case
4 until it is finalized.

5 8. I recognize and accept that any resolution of this lawsuit is subject to court
6 approval, and must be designed in the best interest of the class as a whole. I believe the Settlement
7 is fair and reasonable in light of the issues presented by this case.

8 9. Since initiating this lawsuit, I have considered the interests of the Class just as I
9 would consider my own interests and have put the interests of the other Class Members before
10 my own interests. I am not aware of any interests that I have that are contrary to the interests of
11 the proposed Class Members, and I do not know of any conflicts of interest that would keep me
12 from adequately representing the Class.

13 10. I fully realized the risks I would be taking by pursuing this case as a named plaintiff
14 and class representative. I knew that future employers might conduct a background check on me
15 or otherwise find out about my participation in the lawsuit, and that serving as the class
16 representative could affect my employment opportunities and my ability to secure a job in the
17 future. I also knew that there was no certainty as to the ultimate outcome of this case, and that if
18 Defendant were to prevail in this action there was a possibility I could have been liable for
19 Defendant's litigation costs. Despite these risks, I felt so strongly about standing up for the rights
20 of Defendant's employees that I initiated and participated fully in this lawsuit.

21 11. I believe that I have done everything that my attorneys have asked of me and have
22 tried, to the best of my ability, to represent the class. I think my efforts helped get the result
23 obtained in this case. Accordingly, I respectfully request that the Court approve the Enhancement
24 Payment in the amount of \$7,500.00 in recognition of the benefit I helped obtain for other putative
25 class members, and my active participation in this case. I believe that this amount is fair and
26 reasonable in light of the time I have spent on this case, the risk I assumed in acting as a class
27 representative, and the broader general release I have agreed to as part of the Settlement.
28

12. I am not related to anyone associated with Lawyers for Justice, PC or Parker & Minne, LLP.

13. I do not have any relationship with or financial interest in the Settlement Administrator, ILYM Group, Inc.

14. I have not entered into any undisclosed agreements, and I have not received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement fund as a Class Member.

15. I understand that my attorneys in this case - Parker & Minne, LLP and Lawyers for Justice, PC - have agreed to equally split the attorneys' fees awarded in this case. I was provided a full written disclosure of this agreement and consented to the agreement in writing.

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

Executed on 02/26/2024


Nadia Estrada (Feb 26, 2024 11:04 PST)
Nadia Estrada