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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS**

ALEXIS SALCIDO-CEJA, 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.

MADRUGA ALVES CAR WASH, INC., a
California corporation; FAST TRACK CAR
WASH, LLC, a California limited liability
company; and DOES 1 through 100, inclusive,

Defendants.

Case No. CV-21-003878

Honorable Stacy Speiller
Department 22

CLASS ACTION

**DECLARATION OF ALEXIS SALCIDO-
CEJA IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: September 6, 2024
Time: 8:30 a.m.
Department: 22

Complaint Filed: July 23, 2021
FAC Filed: November 7, 2023
Trial Date: None Set

DECLARATION OF ALEXIS SALCIDO-CEJA

I, **Alexis Salcido-Ceja**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Madruga Alves Car Wash, Inc., and Fast Track Car Wash, LLC (“Defendants”) as an hourly-paid, non-exempt employee from approximately July 2018 to approximately October 2019. I decided to seek legal advice about my work experiences with Defendants. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **9 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and PAGA representative.

3. I have spent over **12 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **14 additional hours** speaking with my attorneys about the case, identifying

1 potential witnesses, providing my attorneys with documents and information concerning the
2 case, and also describing policies, practices, and procedures of Defendants.

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

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

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

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

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

20 Executed this ^{03/19/2024} ____ day of March 2024, at Madera, California

21  Electronically Signed - 2024-03-20 00:14:30 UTC - 107.116.89.125
22 Xintex AssureSign® 7961ef2-b668-43eb-bbaa-b13801880747

23 Alexis Salcido-Ceja