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Attorneys for Plaintiff, the Putative Class, and the Aggrieved Employees

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

JUSTINA BALDERRAMA, an individual,
on behalf of herself, the State of California,
as a private attorney general, and on behalf
of all others similarly situated,

Plaintiff,

v.

OMNI ENTERPRISES, INC., a California
Corporation; and DOES 1 TO 50,

Defendants.

Case No. 30-2022-01256174-CU-OE-CXC

**DECLARATION OF JUSTINA BALDERRAMA IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ORDER GRANTING PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: March 20, 2025

Time: 2:00 P.M.

Dept: CX104

Judge: Hon. Melissa R. McCormick

Complaint Filed: April 22, 2022

First Amended Complaint Filed: July 19, 2022

Trial Date: None Set

1 I, Justina Balderrama, hereby declare:

2 1. The facts set forth herein are true of my own personal knowledge, and if called upon to
3 testify thereto, I could and would competently do so under oath.

4 2. I am the named Plaintiff in this action. On or around April 22, 2022, the Class Action
5 Complaint entitled *Justina Balderrama v. Omni Enterprises, Inc.*, Case No. 30-2022-01256174-CU-OE-
6 CXC, was filed in the Superior Court of California, Orange County, on behalf of me, and all other
7 current and former employees who were similarly situated.

8 3. During my employment with Defendant, I have not been paid all minimum and overtime
9 wages owed, I did not receive compliant meal and rest breaks or receive missed meal and rest break
10 premiums, I was not issued accurate wage statements, and did not receive all of my wages due during
11 and at termination of my employment.

12 4. I understand that, as a Class Representative, I have a duty to look out for and protect the
13 interest of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in
14 this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Class
15 Members. Given the various defenses asserted by Defendant, I believe, along with my attorneys, that
16 the settlement obtained is fair and reasonable to the Class.

17 5. As the named Plaintiff in this action, I provided invaluable assistance to Class Counsel
18 and the Class in this case, including providing factual background for the mediation and Class
19 Complaints; reviewing the relevant documents and Complaint; participating in phone calls with my
20 lawyers to discuss litigation and settlement strategy; participating in a full-day mediation by telephone;
21 and reviewing the settlement documents. My efforts were instrumental in securing the favorable terms
22 of the Settlement Agreement, which will provide monetary compensation to the Class of approximately
23 287 current and former employees of Defendant. I also agreed to participate in this case with no
24 guarantee of personal benefit.

25 6. This case also involved risks for me, such as the potential risk of having to pay
26 Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a
27 successful resolution and settlement.
28

7. It is my understanding that based upon my industrious efforts as the named Plaintiff in this action there is something called a Class Representative Incentive Award. I respectfully request that the Court grant this award to me in the amount of \$7,500.00 in addition to my pro rata share of the settlement fund.

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

Executed on 11/6/2024 in Orange County, California.

DocuSigned by:
JUSTINA B
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Justina Balderrama