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David W. Slayton,
Executive Officer/Clerk of Court,
By S. Trinh, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – COMPLEX CIVIL DEPARTMENT

JOHN ARIAS, individually, and on behalf of all
others similarly situated; and JEFFREY
HENSLEY, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

FLOWSERVE US, INC.; and DOES 1 through
10, inclusive,

Defendants.

Case No. 22STCV27829

**CLASS ACTION AND
REPRESENTATIVE ACTION**

[Assigned for all purposes to: Hon. Maren E.
Nelson, Dept. 17]

**DECLARATION OF SILVIA
ARGULETA FOR LEGAL AID
FOUNDATION OF LOS ANGELES, RE
CY PRES FUNDS**

[Filed concurrently with: Plaintiff's Notice of
Motion and Motion for Preliminary Approval
of Class Action Settlement, Memorandum of
Points and Authorities; and [Proposed] Order
Granting Plaintiff's Motion for Preliminary
Approval of Class Action Settlement]

PRELIMINARY APPROVAL HEARING

Date: February 9, 2024

Time: 9:00 a.m.

Dept: 17

1 **DECLARATION SILVIA R. ARGUETA REGARDING CY PRES DESIGNATION**

2 I, SILVIA R. ARGUETA, declare as follows:

3 1. I am an individual over the age of 18. I have personal knowledge of the facts set
4 forth below and if called to testify I could and would do so competently.

5 2. I am employed as the Executive Director for the Legal Aid Foundation of Los
6 Angeles (“LAFLA”). My business address is 1550 W 8th Street, Los Angeles, CA 90017. My
7 business phone number is 323-801-7906.

8 3. This declaration is submitted in support of John Arias v. Flowserve US, Inc. and for
9 approval of LAFLA as the Cy Pres recipient of the unclaimed proceeds from the class action
10 settlement.

11 4. LAFLA has a total staff of 220, including 104 attorneys, with five offices (ROJC
12 Los Angeles, South Los Angeles, East Los Angeles, Long Beach and Santa Monica), four self-help
13 centers, and three domestic violence clinics. As LAFLA’s Executive Director, I oversee strategy,
14 advocacy, fund development, and finances.

15 5. As the frontline advocate for poor and low-income individuals since 1929, LAFLA
16 works to provide clients with access to fundamental services: food, housing, employment, safety
17 and security. Our client services range from assistance with veterans benefits to employment
18 issues to providing eviction defense, relief from domestic violence, and government benefits.
19 LAFLA has five workgroups including Housing and Communities, Economic Stability, Supporting
20 Families, Eviction Defense Center, and two specialty projects: Veterans Justice Center and Asian
21 & Pacific Islander Community Outreach Project. LAFLA takes great pride in having one of the
22 most culturally and linguistically diverse staff in the legal services community, in one of the most
23 diverse cities in the country.

24 6. LAFLA is the first place to which thousands of poor people turn to when they
25 need legal assistance for a crisis that threatens their homes, health and livelihood. In 2022,
26 over 100,000 individuals and families were assisted throughout all of our program areas.
27 LAFLA is a channel for change for the conditions that cause or aggravate poverty for poor and
28 low-income people and for those who face systemic barriers to equal justice, equal
opportunity, and too often, basic human rights.

1 7. LAFLA is an accredited 501 (c)(3) charity and it will be financially accountable for
2 the funds.

3 8. 85% of LAFLA's clients are members of a minority group.

4 9. LAFLA has a strong commitment to South Los Angeles. LAFLA has had a
5 dedicated office in South Los Angeles for over 40 years.

6 10. As of the date of this declaration, in 2023, LAFLA has been awarded Cy Pres funds
7 in over 30 cases (both state and federal).

8 11. LAFLA is supported by the State Bar of California through a variety of grants
9 including the Trust Fund Commission which provides Equal Access Funding and IOLTA funding
10 to LAFLA. Additionally, LAFLA staff members serve on a variety of State Bar committees.

11 12. CCCP section 384 (a) allows Cy Pres funds to be distributed to an organization to
12 further the purpose underlying causes of action, or to promote justice for all Californians. CCCP
13 section 384 (b) authorizes the trial court to direct residual funds to nonprofit organizations
14 providing civil legal services to the indigent, or nonprofit organizations to support projects that will
15 benefit the class or similarly situated persons.

16 13. LAFLA's mission is to achieve equal justice for poor and low-income people in
17 greater Los Angeles.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct. Executed at Los Angeles, California on October 12, 2023
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24 _____
25 SILVIA R. ARGUETA
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