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*Attorneys for Plaintiff and Proposed
 Class Members*

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

ISAAC ALVAREZ, individually, and on behalf
 of all others similarly situated,

Plaintiff,

v.

VALLEY CONNECTION, LLC DBA CARL'S
 JR., a California limited liability company; and
 DOES 1 through 10, inclusive,

Defendants.

Case No. 22CV-00985

*[Assigned for all purposes to the Honorable
 Brian McCabe, Courtroom 8]*

**DECLARATION OF ISAAC ALVAREZ
 IN SUPPORT OF PLAINTIFF'S
 MOTION FOR FINAL APPROVAL OF
 CLASS ACTION SETTLEMENT**

*[Filed with Motion for Final Approval of
 Class Action Settlement, Declaration of Justin
 F. Marquez, Declaration of Valerie Olivares,
 and Proposed Judgment]*

FINAL APPROVAL HEARING

Date: April 27, 2023

Time: 8:15 a.m.

Dept: 8

DECLARATION OF ISAAC ALVAREZ

I, Isaac Alvarez, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the named Plaintiff in this action and submit this declaration in support of Plaintiff's Motion for Final Approval of Class Action Settlement. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$8,000 service payment for my role as the Class Representative.

3. I am a former employee of Defendant Valley Connection, LLC dba Carl's Jr. ("Valley Connection"). I worked at Valley Connection from approximately July 2021 to approximately November 2021 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Valley Connection's policies and practices that have been alleged as unlawful in the Class Action Complaint ("Complaint") and Private Attorneys General Action ("PAGA") Notice sent to Valley Connection and the Labor & Workforce Development Agency ("LWDA").

4. I filed this lawsuit in because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks. While working at Valley Connection, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks. I also observed my co-workers working long hours without taking breaks.

5. By originating this lawsuit as a Class Representative, I hoped that I might be able to change Valley Connection's policies to better protect the working conditions of my co-workers. I also understood it was my duty as the Class Representative to represent the best interests of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

6. I have actively participated in the litigation of this action. Prior to commencing this case, I provided Wilshire Law Firm with a detailed account of the facts related to my employment with Valley Connection, including, but not limited to, my belief that Defendant had a policy and practice of not providing its employees with California compliant meal and rest

1 periods and requiring its employees to work “off-the-clock” prior to clocking in for the workday,
2 during meal periods, and after clocking out for the workday. Additionally, I provided my
3 counsel with documentation in the form of pay statements and other documents that applied to
4 my employment with Valley Connection. Based on these documents and my conversations with
5 my attorneys, my attorneys and I were able to identify instances when I was not paid correctly.

6 7. I have invested a lot of personal time and energy while this lawsuit has been
7 pending. I made it a priority to be actively involved because I wanted to do everything I could to
8 assist my attorneys in prosecuting this case. I regularly communicated with my attorneys to
9 discuss updates on the case and to provide my attorneys with information. I communicated with
10 my attorneys via phone calls, text messages, and e-mails. Some of these phone calls lasted up to
11 40 minutes.

12 8. I made myself available during the mediation for this case and I kept in regular
13 contact my attorneys before and after the mediation to ensure that any questions the attorneys had
14 could be answered.

15 9. I also reviewed pleadings filed in this case, including the settlement-related
16 documents.

17 10. I believe the settlement is a good settlement and I would recommend that the
18 Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad
19 that I had the opportunity to represent the class in this lawsuit and that I was able to recover
20 money through a settlement for the class. I have also observed my attorneys’ work throughout
21 this case and I believe they have been thorough, diligent, prompt, courteous, and professional.

22 11. Standing up for myself and the rights of others was not an easy decision, and I am
23 relieved that this is coming to an end. I estimate that I spent at least 40 hours on this case.

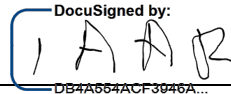
24 12. I did not make the decision to file a class action lightly. I was concerned by the
25 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
26 associated with a lawsuit that I filed against my former employer. I was aware that it is possible
27 to perform background checks of publicly filed documents on the Internet, sometimes with
28 nothing more than a simple Google search. I am mindful that employers might find out that I

1 sued a former employer, and this could hurt my employability.

2 13. I respectfully request that the Court award me a \$8,000 service payment. Based on
3 my involvement in this case and the benefits provided to my former co-workers, I can say I
4 helped stand up for the other workers who may have been too afraid to say anything to
5 management because they did not want to risk losing their jobs or risk the stigma of suing an
6 employer. I was not afraid to take that risk because I strongly care about helping out my current
7 and former co-workers. I also continue to fear that any employer may find out that I participated
8 in this lawsuit and hold it against me. In a competitive job market, this factor may weigh heavily
9 against me. Nevertheless, I felt that important rights were at stake that hurt myself and other
10 employees.

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

13 Executed on 4/3/2023 at Los Banos, California.

14 DocuSigned by:
15 
16 DB4A664ACF3946A...

17 Isaac Alvarez

Alvarez v. Valley Connection, LLC dba Carl's Jr., et al.
22CV-00985

I, Ashley Narinyans, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is anarinyans@wilshirelawfirm.com.

On April 5, 2023, I served the foregoing **DECLARATION OF ISAAC ALVAREZ IN SUPPORT OF PLAINTIFF’S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Attorneys for Defendant

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

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

Executed on April 5, 2023, at Los Angeles, California.


Ashley Narinyans