

Justin F. Marquez (SBN 262417)
justin@wilshirelawfirm.com
Benjamin H. Haber (SBN 315664)
benjamin@wilshirelawfirm.com
Arrash T. Fattahi (SBN 333676)
afattahi@wilshirelawfirm.com
WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

IVAN SANCHEZ, individually, and on behalf of
all others similarly situated,

Plaintiffs,

v.

DANCO ANODIZING, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 22STCV10916

CLASS ACTION

*[Assigned for all purposes to: Hon. Carolyn
B. Kuhl]*

**DECLARATION OF PLAINTIFF IVAN
SANCHEZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF IVAN SANCHEZ

I, Ivan Sanchez, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Danco Anodizing, Inc. ("Defendant"). I worked for Defendant from July 2021 to approximately February 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys General Act ("PAGA") Notice sent to Defendant and the Labor & Workforce Development Agency ("LWDA").

4. I initiated this lawsuit 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.

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

6. I have invested a lot of personal time and energy into this lawsuit. As detailed more fully below, I have spent approximately 60 hours on this case. I made it a priority to be actively involved because I wanted to do everything I can to assist my attorneys in prosecuting this case.

7. Throughout this case, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information. For example, during some of the phone calls, my attorneys and I were able to identify instances when I was not paid correctly.

1 Additionally, leading up to both mediations in this case in January 2023 and October 2023, I had
2 multiple lengthy phone calls with Wilshire Law Firm regarding the claims at issue and what was
3 to transpire at the mediation.

4 8. I appeared for a full-day deposition in this matter, for which I spent time preparing
5 ahead of time. I also responded to Defendant's Request for Production of Documents and Special
6 Interrogatories with the assistance of my attorneys.

7 9. Throughout the case, I also spent time looking for documents relevant to the case to
8 send to my attorneys. I spent numerous hours looking for these documents, including when I first
9 contacted my attorneys, before my attorneys filed the case, when responding to Defendant's
10 Requests for Production of Documents, and before my case was mediated. I also spent time
11 reviewing legal documents in this case, including the retainer and settlement agreement and
12 discussed, in detail, the terms with my attorneys.

13 10. Additionally, I made myself fully available on the day of mediation and was in
14 continuous contact with my attorneys to assist with any questions or issues that may have arisen.

15 11. I believe the settlement is a good settlement and I would recommend that the Court
16 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
17 had the opportunity to represent the class in this lawsuit and that I was able to recover money
18 through a settlement for the class.

19 12. I did not make the decision to file a class action lightly. I was concerned by the
20 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
21 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
22 employers might find out that I sued Defendant. Nevertheless, I felt that important rights were at
23 stake that hurt everyone, and something ought to be done about it.

24 13. I also understand that there was financial risk in bringing this lawsuit. For example,
25 I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's
26 attorneys' fees and costs.

27 14. I understand that the settlement agreement provides a service payment to me in the
28 amount of \$12,500. I believe this amount is fair compensation for my time and effort on this case,

1 for helping to prosecute this case, and the risks with respect to my future employment. For
2 example, I have not been able to find employment since working for Defendant which has made it
3 difficult for me to pay for my regular expenses including rent, bills, and food. I believe this is in-
4 part because I filed this lawsuit.

5 15. In addition, the settlement requires that I enter into a general release, which I
6 understand is broader than the release that will bind other class members. I am receiving no
7 compensation additional to that provided for in the settlement.

8 16. Based on my involvement in this case and the benefits provided to my former co-
9 workers, I can say I helped stand up for the other workers who were too afraid to say anything to
10 management because they did not want to risk losing their jobs or risk the stigma of suing an
11 employer. I was not afraid to take that risk because I strongly care about helping out my former
12 co-workers.

13 17. I reviewed (and ultimately signed) the Class Action and PAGA Settlement
14 Agreement and Class Notice in full and my attorneys answered all the questions I had. I believe
15 the settlement terms and allocations are fair, adequate, and reasonable given the strength of the
16 class claims and Defendant's defenses.

17 18. I have no conflicts of interest with any class member or the Settlement
18 Administrator, Apex Class Action.

19 19. I am not aware of any other pending matter or action asserting claims that will be
20 extinguished or adversely affected by the Settlement.

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

23 Executed on 4/26/2024, at Santa Ana, California.

24 DocuSigned by:
25 Ivan Sanchez
26 AE1D707AF80D486...
27 Ivan Sanchez
28

Sanchez v. Danco Anodizing, Inc., et al.
22STCV10916

I, Min Jee Kim, 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 minjee@wilshirelawfirm.com.

On April 26, 2024, I served the foregoing **DECLARATION OF PLAINTIFF IVAN SANCHEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY 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:

Steven A. Groode (SBN 210500)
sgroode@littler.com
 Grace L. Waddell (SBN 327186)
gwaddell@littler.com
LITTLER MENDELSON, P.C.
 2049 Century Park East, 5th Floor
 Los Angeles, California 90067-3107
 Telephone: (310) 553-0308
 Facsimile: (310) 553-5583

Attorneys for Defendant

- (X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.
- (X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE.**

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 26, 2024, at Los Angeles, California.


Min Jee Kim