

Jonathan M. Genish (State Bar No. 259031)
jgenish@blackstonepc.com
Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff Angel Rodriguez

[Additional counsel listed on next page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ANGEL RODRIGUEZ, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

AMERICAN TEXTILE MAINTENANCE, a
California corporation; and DOES 1 through 25,
inclusive,

Defendants.

LUCIO MENJIVAR, on behalf of himself and all
other aggrieved employees,

PLAINTIFF,

vs.

AMERICAN TEXTILE MAINTENANCE
COMPANY, a California corporation d/b/a
REUPUBLIC MASTER CHEFS TEXTILE
RENTAL SERVICES, and DOES 1 through 10,
inclusive,

DEFENDANTS.

Case No.: 22STCV17855 (Lead)
(Consolidated with Case No. 22STCV10611)

Honorable Elaine Lu
Department 9

**DECLARATION OF MADELY NAVA
REGARDING WORKWEEKS**

Date: December 4, 2024
Time: 9:00 a.m.
Dept.: 9

Menjivar Action Filed: March 28, 2022
Rodriguez Action Filed: May 31, 2022
Rodriguez FAC Filed: August 4, 2022
Trial Date: Not Set

1 Rana Nader (State Bar No. 247182)
nader@proxylawfirm.com
2 Hengameh S. Safaei (State Bar No. 248048)
safaei@proxylawfirm.com
3 **PROXY LAW FIRM LLP**
10880 Wilshire Boulevard, Suite 1101
4 Los Angeles, California 90024
Tel: (310) 853-8333 / Fax: (310) 861-5931
5

6 Attorneys for Plaintiff Lucio Menjivar
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1. I am the Case Manager for the proposed settlement administrator Apex Class Action LLC, a class action settlement administration company headquartered in Irvine, California. I have personal knowledge of the facts outlined in this declaration and, if called as a witness, I could and would competently testify thereto.

2. Apex Class Action's team has been directly involved with class action administration for a combined 15 years and has successfully managed numerous class action cases during that time. Our team comprises experienced professionals with extensive knowledge of class action settlement administration. In addition, Apex Class Action has the necessary technology and infrastructure to efficiently manage large-scale class action cases. We utilize state-of-the-art software and systems to ensure that all aspects of the administration process are executed accurately and efficiently.

3. Pursuant to the Court's direction, the Parties' counsel requested that Apex calculate the Workweeks to determine whether the escalator clause of the settlement agreement was triggered.

4. On September 16, 2024, counsel for Defendant provided Apex with the “Class List.” The Class List contained the following information for each Class Member: full name, last known mailing address, Social Security number, dates worked for Defendant during the Class Period, and such other information as was necessary for Apex to calculate the Workweeks.

5. We uploaded the Class List to our database and conducted a thorough review of duplicates and potential inconsistencies. After which, we calculated the Workweeks. The Class List comprised 1,481 individuals who worked a total of 109,614 Workweeks. Based on our calculations, the escalator clause was not triggered.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that this Declaration was executed this 11th day of October 2024, in Irvine, California.

Madely Nava