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Attorneys for Plaintiff Angel Rodriguez

**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 Yu  
Department 9

**DECLARATION OF PLAINTIFF ANGEL  
RODRIGUEZ IN SUPPORT OF MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION AND PAGA SETTLEMENT**

Date: September 3, 2024  
Time: 10:00 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

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1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-captioned case entitled *Angel Rodriguez v. American Textile Maintenance*, Los Angeles County Superior Court Case No. 22STCV17855. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

3. Because I thought the practices at American Textile may not be lawful, I decided to seek legal advice about my work experiences at American Textile and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure American Textile was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a class and PAGA representative. This process included searching for and providing documents concerning my employment with American Textile, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from American Textile.

5. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained. I made myself available to answer any questions my attorneys had about American Textile's practices and treatment

1 of its employees whenever they needed me. I responded to them as quickly as possible and gave them  
2 as much information as I could.

3 6. I understood that in the event this matter did not settle and proceeded with trial, I would  
4 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any  
5 responsibilities that are necessary for this lawsuit.

6 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several  
7 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I  
8 also understood there was a risk of losing any future job and/or income due to the time that I would  
9 have to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed.  
10 Most importantly, I believe that by pursuing this case, I have taken a significant risk because future  
11 employers can easily find out that I sued my prior employer, and that may negatively impact my ability  
12 to find employment within this industry – and even outside of it – in the future. In contrast, the other  
13 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk  
14 that I took in bringing this action.

15 8. I reviewed the settlement agreement, discussed the settlement agreement with my  
16 attorneys, and asked them questions before signing it.

17 9. I believe that I have done everything that my attorneys have asked of me and tried, to  
18 the best of my ability, to seek relief for the Class, the PAGA Members, and the State of California. In  
19 total, I have spent approximately 30 to 35 hours participating in this case as described above. I believe  
20 my efforts helped get the result obtained in this case.

21 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court  
22 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times  
23 throughout the course of this litigation I have considered the interests of the Class and put them before  
24 my own personal interests.

25 11. I understand that incentive or enhancement awards are discretionary and intended to  
26 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and  
27 other employees; the financial and/or reputational risk undertaken in bringing the class and/or PAGA  
28 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe

1 my work in this matter is meritorious on these points for the reasons set forth above.

2 12. I respectfully request that the Court approve and award me an Enhancement Payment  
3 in the amount of \$7,500.00 for my efforts and active participation in the case and for the broader,  
4 general release of all claims pursuant to California Civil Code Section 1542. Taking into consideration  
5 the time that I dedicated to this case, I believe that this amount is reasonable.

6 13. I understand that Blackstone Law, APC will share attorneys' fees in this matter with  
7 Proxy Law Firm LLP and Hinden & Breslavsky, APC. I agreed to this in writing. I understand that  
8 the amount of attorneys' fees will not increase as a result of this fee sharing.

9 14. I am not related to anyone associated with Blackstone Law, APC, Proxy Law Firm  
10 LLP, or Hinden & Breslavsky, APC.

11 I declare under penalty of perjury under the laws of the State of California that the foregoing  
12 is true and correct. Executed on 05/15/2024, at Los Angeles, California.

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