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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

ILIANA LIZBETH BARAJAS MAYA,
individually, and on behalf of all others
similarly situated,

Plaintiff,

v.

UNITED FACILITIES GROUP, INC., a
California corporation; and DOES 1 to 10,
inclusive,

Defendants.

—

ILIANA LIZBETH BARAJAS MAYA, on
behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

UNITED FACILITIES GROUP, INC., a
California corporation; and DOES 1 to 10,
inclusive,

Defendants.

Case Nos.: 22CV397353 (Class Action);
22CV401148 (PAGA Action)

CLASS ACTION

[Assigned for all purposes to: Hon. Charles F.
Adams, Dept. 7]

**DECLARATION OF PLAINTIFF ILIANA
LIZBETH BARAJAS MAYA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 **DECLARATION OF PLAINTIFF ILIANA LIZBETH BARAJAS MAYA**

2 I, Iliana Lizbeth Barajas Maya, declare as follows:

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

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

11 3. I am a former employee of Defendant United Facilities Group, Inc. ("Defendant").
12 I worked for Defendant from approximately June 2019 to approximately August 2021 as an hourly-
13 paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of
14 Defendant's policies and practices that have been alleged as unlawful in these cases.

15 4. I initiated this lawsuit because I was concerned that I was not paid properly for all
16 the hours that I worked, and I was not provided all of my meal and rest breaks.

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

21 6. I have invested a lot of personal time and energy into this lawsuit. As detailed more
22 fully below, I have spent at least 45 hours on this case. I made it a priority to be actively involved
23 because I wanted to do everything I can to assist my attorneys in prosecuting this case.

24 7. Throughout this case, I spent a lot of time on the phone with my attorneys to get
25 updates about the case and provide them with information. For example, during some of the phone
26 calls, my attorneys and I were able to identify instances when I was not paid correctly.
27 Additionally, leading up to the mediation in March 2023, I had multiple lengthy phone calls with
28 Wilshire Law Firm regarding the claims at issue and what was to transpire at the mediation.

1 8. Throughout the case, I also spent time looking for documents relevant to the case to
2 send to my attorneys. I spent numerous hours looking for these documents, including when I first
3 contacted my attorneys, before my attorneys filed the case, and before my case was mediated. I
4 also spent time reviewing legal documents in this case, including the settlement agreement that I
5 discussed, in detail, with my attorneys.

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

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

12 11. I did not make the decision to file a class action lightly. I was concerned by the
13 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
14 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
15 employers might find out that I sued an employer. For example, after the filed this case, I was
16 unable to find work with a different employer for many months. Nevertheless, I felt that important
17 rights were at stake that affected other employees and myself.

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

21 13. I understand that the settlement agreement provides a service payment to me in the
22 amount of \$10,000. I believe this amount is fair compensation for my time and effort on this case,
23 for helping to prosecute this case, and the risks with respect to my future employment. In addition,
24 the settlement requires that I enter into a general release, which I understand is broader than the
25 release that will bind other class members. I am receiving no compensation additional to that
26 provided for in the settlement.

27 14. Based on my involvement in this case and the benefits provided to my former co-
28 workers, I can say I helped stand up for the other workers who were too afraid to say anything to

1 management because they did not want to risk losing their jobs or risk the stigma of suing an
2 employer. I was not afraid to take that risk because I strongly care about helping out my former
3 co-workers.

4 15. I reviewed and then signed the Class Action and PAGA Settlement Agreement in
5 full and my attorneys answered all the questions I had. I believe the settlement terms and
6 allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's
7 defenses.

8 16. I also have no conflicts of interest with any class member or the Settlement
9 Administrator, CPT Group, Inc.

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

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

14 Executed on 2/27/2024, at Newman, California.

15 DocuSigned by:

16 Iliana Barajas

17 6C502EAE9AD940C...

18 Iliana Lizbeth Barajas Maya

PROOF OF SERVICE

Maya, et al. v. United Facilities Group, Inc., et al.
22CV397353; 22CV401148

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Sandy S. Sespene, 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 sspene@wilshirelawfirm.com.

On **February 28, 2024**, I served the foregoing **DECLARATION OF PLAINTIFF ILIANA LIZBETH BARAJAS MAYA 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:

Alexei Kuchinsky (SBN 279405)
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 Jeanne Floresca
aj@kuchinskylawoffice.com
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 220 Montgomery Street, Suite 2100
 San Francisco, California 94104
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 Facsimile: (628) 200-0907

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.

(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.

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

Executed on **February 28, 2024**, at Los Angeles, California.


Sandy S. Sespene