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Attorneys for Plaintiff

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

HERNAN RAI ZARAGOZA LEMUS,
individually and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

WILLIAM KREYSLER & ASSOCIATES,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendant.

Case No. 22CV000774

Honorable Cynthia P. Smith
Courtroom A

**DECLARATION OF HERNAN RAI
ZARAGOZA LEMUS IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND
COSTS, GENERAL RELEASE FEE,
AND SETTLEMENT
ADMINISTRATION COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Labor
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys' Fees and Costs,
General Release Fee, and Settlement
Administration Costs; Declaration of
Proposed Class Counsel (Elizabeth Parker-
Fawley); and [Proposed] Order filed
concurrently herewith]

Date: October 8, 2024
Time: 8:30 AM
Courtroom: A

Complaint Filed: September 13, 2022
FAC Filed: June 4, 2024
Trial Date: None Set

**DECLARATION OF HERNAN RAI ZARAGOZA LEMUS IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND AWARD OF ATTORNEYS' FEES AND COSTS, GENERAL
RELEASE FEE, AND SETTLEMENT ADMINISTRATION COSTS**

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1 **hours** speaking with my attorneys about the case, identifying potential witnesses, providing my
2 attorneys with documents and information concerning the case, and also describing policies,
3 practices, and procedures of Defendant.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **1 hour** reviewing the settlement agreement
6 and about **1 hour** asking questions and discussing the potential settlement with my attorneys before
7 signing the settlement agreement.

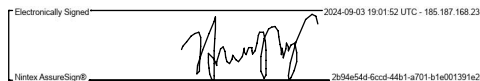
8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
10 California. I think my efforts helped to get the result obtained in this case, and as a PAGA
11 representative, I respectfully request that the Court award me a service payment in the amount of
12 \$7,500.00 for my active participation in this case. Taking into consideration the time that I have
13 dedicated to this case, I believe that this amount is reasonable.

14 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as a service payment, as well as my share of the settlement as an aggrieved
18 employee.

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

21
22 Executed this 9/3, day of September 2024, at Sacramento, California.

23
24 The image shows an electronic signature box. At the top, it says "Electronically Signed". In the center, there is a handwritten signature in black ink. At the bottom, there is a long alphanumeric string: "2024-09-03 19:01:52 UTC - 185.187.168.231".

25 Hernan Rai Zaragoza Lemus