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Attorneys for Plaintiffs RICARDO GUTIERREZ
And ANDRE GREEN

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

R.B WILSON, individually and on behalf of all
other persons similarly situated, and on behalf of
the general public,

Plaintiff,

v.

THE SYGMA NETWORK, INC., a Delaware
Corporation; SYSCO CORPORATION, a
Delaware Corporation and Does 1 through 30,
inclusive,

Defendants.

Case No.: 22STCV14669 (Lead Case)
[Consolidated with Case No. 22STCV30206]

Honorable David S. Cunningham III
Department 11

**DECLARATION OF PLAINTIFF ANDRE
GREEN IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

RICARDO GUTIERREZ, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorney's General Act;

Plaintiff,

vs.

THE SYGMA NETWORK, INC., a Delaware
corporation; and DOES 1 through 100, inclusive,

Defendants

DECLARATION OF ANDRE GREEN

I, **ANDRE GREEN**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. 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.

2. I was employed by Defendant The Sygma Network, Inc. (“Defendant”) as an hourly-paid, non-exempt employee from approximately November 2022 to approximately June 2023. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **3 hours** discussing my situation, complex wage-and-hour representative actions in general, what it meant to be a named plaintiff and class/PAGA representative, and the risks and potential costs of such a lawsuit.

3. I have spent over **10 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a named plaintiff, class representative, and a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of hourly-paid and non-exempt employees, helping develop a strategy as to what documents and information to obtain from Defendant, and obtaining updated on the status of the case. 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.

4. I was available to answer any questions my attorneys had and available to speak and meet with my attorneys whenever they needed me throughout the litigation. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **8 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also

describing policies, practices, and procedures of Defendant, including in preparation for, and during, mediation.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement and about **1 hour** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

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

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

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment as well as my share of the settlement as a class member and/or aggrieved employee.

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

Executed on 12/03/2025, at Amarillo, Texas.

Electronically Signed 2025-12-04 02:20:03 UTC - 172.56.183.48
Nintex AssureSign® 163cf3bb-b9f6-4522-94d7-93a801884a9f

Andre Green