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Attorneys for Plaintiff and the proposed class

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

DIYARI CORRAL-BEY, an individual, on
behalf of himself and others similarly situated

PLAINTIFF,

v.

FLUOR FLATIRON BALFOUR BEATTY
DRAGADOS DBJV (DBA LINXS); and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 22STCV20310

[Case Assigned for All Purposes to Hon. David
S. Cunningham in Dept. 11]

**DECLARATION OF DIYARI CORRAL-
BEY IN SUPPORT OF FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: August 4, 2025
Time: 10:00 AM
Dept.: 11

Complaint Filed: July 22, 2022
Trial Date: None Set

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2 **DECLARATION OF DIYARI CORRAL-BEY**

3 I, Diyari Corral-Bey, state and declare as follows:

4 1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the
5 above-captioned matter. The following is based upon my personal knowledge, and if called as a
6 witness, I could and would testify competently thereto.

7 2. I am a former employee of Defendant Fluor Flatiron Balfour Beatty Dragados
8 DBJV (DBA LINXS) (“Linx” or “Defendant”) as a General Laborer.

9 3. In my role as a General Laborer, I regularly did not receive reimbursement for
10 business-related expenses for cell phone use, tools, and mileage

11 4. I understand that I am representing other employees and I believe that I am able to
12 represent them well.

13 5. I first researched experienced attorneys who are very experienced with these types
14 of lawsuits. Once retained, I compiled relevant documents from my employment to assist my
15 attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims
16 in this lawsuit. The lawsuit was filed in July 2022.

17 6. Throughout the litigation, I have provided my attorneys with helpful information
18 for this lawsuit and for the Settlement as needed. Additional work in connection with this matter
19 includes providing information to my attorneys regarding my employment with Defendant, staying
20 in regular contact with my attorneys to discuss the status of the case, responding promptly to my
21 attorneys’ various communications regarding this matter, attending a full-day mediation on April
22 10, 2024; and reviewing and analyzing the settlement agreement and settlement papers to ensure
23 the settlement was fair and reasonable and in the best interests of the Class Members.

24 7. Though I did not keep contemporaneous time records, I estimate the total time spent
25 in connection with this matter is approximately 10-15 hours.

26 8. I have worked to actively represent the other Class Members and their interests.

27 9. I have always kept the Class Members interests at heart in this litigation.

28 10. I am prepared to continue assisting with this litigation and am committed to

1 achieving the best possible results for the Class.

2 11. I believe that the class action settlement obtained on behalf of the Class is fair and
3 reasonable in light of the issues involved in this case. As mentioned above, I reviewed and
4 discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure
5 that I understood its terms and what it would mean for all of the class members.

6 12. I believe that I have fairly represented the absent Class and request that the Court
7 finally approve this settlement and confirm me as Class Representative.

8 13. I am not aware of any conflicts of interest that prevent me from being confirmed as
9 Class Representative in this Lawsuit. I am not related in any way to my attorneys or to any other
10 member of the firm that is representing me. I have no business dealings or other involvement
11 beyond this lawsuit and this representation. I have not been promised any money or inducement
12 to serve as Class Representative in this Lawsuit.

13 14. It is my opinion that the settlement agreement provides for a fair and adequate
14 enhancement for me as a Class Representative, in the amount of \$5,000.00. I believe that this is
15 fair and reasonable in light of all of the work that I have performed in my role as Class
16 Representative. As Class Representative, I have actively participated in all stages of the litigation,
17 as detailed above, and have always maintained the best interests of the Class while performing my
18 Class Representative duties.

19 15. It is also my opinion that the Class Representative enhancement is fair, reasonable,
20 and adequate because, in addition to the many hours spent participating in the prosecution of this
21 case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we
22 were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being a Class
23 Representative in a class action labor dispute, which may affect my future employability.

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

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4 Executed this 9 day of July, 2025 at Los Angeles, California.
5 (City)

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8 Diyari Corral-Bey
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On July 11, 2025, I served all interested parties in this action the following documents described as: **DECLARATION OF DIYARI CORRAL-BEY IN SUPPORT OF FINAL APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

FISHER & PHILLIPS LLP

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Attorneys for Plaintiff

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE) On interested parties set forth on the attached service list.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 11, 2025, at Encino, California.



Kimberly Madrid