

Arrash T. Fattahi (SBN 333676)
arrash.fattahi@wilshirelawfirm.com
Benjamin H. Haber (SBN 315664)
benjamin@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
3055 Wilshire Boulevard, 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs

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

SOCORRO OCHOA, ANA GAYTAN
GARCIA, TERESA GONZALEZ VEGA,
LILIANA J. MOISEN, ANDREA GARCIA
CERVANTES, and CECILIA CERVANTES,
individually, and on behalf of all others similarly
situated; ANA GAYTAN GARCIA and
TERESA GONZALEZ VEGA, on behalf of the
State of California and other aggrieved persons,

Plaintiffs,

v.

LA TAVOLA, LLC, a California limited
liability company; BBJ RENTALS INC., a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 22CV000862

CLASS & REPRESENTATIVE ACTION

**DECLARATION OF PLAINTIFF
ANDREA GARCIA CERVANTES IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF ANDREA GARCIA CERVANTES

I, Andrea Garcia Cervantes, declare as follows:

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

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

3. I am a former employee of La Tavola, LLC and BBJ Rentals Inc. (collectively, "Defendants"). I worked for Defendants from approximately May 2019 to approximately November 2019 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendants' policies and practices that have been alleged as unlawful in the First Amended Class & Representative Action Complaint.

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

5. By participating in this lawsuit as a class representative, I hoped that I might be able to change Defendants' policies to better protect the working conditions of my co-workers. I understood that it was my duty as a class representative to represent the best interests of the class over my own individual claims.

6. I have invested a lot of personal time into this lawsuit because I wanted to help the absent class members as much as I could. As detailed more fully below, I have spent approximately 20-30 hours on this case.

7. Throughout this litigation, I spent a lot of time on the phone with my attorneys to get updates about the case and provide them with information regarding the claims at issue. Additionally, leading up to the mediation in October 2023, I had multiple lengthy phone calls with Wilshire Law Firm, PLC regarding the nuanced issues that were to be advanced at mediation.

8. Throughout the case, I spent numerous hours looking for the documents to help the case, including when I first contacted my attorneys, before my attorneys filed the case, and before my case was mediated.

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

10. I believe the settlement achieved is a great settlement and I would recommend that the Court approve it because I believe that it is fair, adequate, and reasonable. I am glad that I was able to assist in achieving this result for the class members.

11. Joining this class action was not an easy decision for me. I was concerned by the attention a publicly filed lawsuit would attract. Nevertheless, I felt that important rights were at stake that hurt everyone, and something ought to be done about it.

12. I understand that the settlement agreement provides a service payment to me in the amount of \$5,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, I have entered into a general release, which is broader than the release that will bind other class members. I am receiving no compensation additional to that provided for in the settlement.

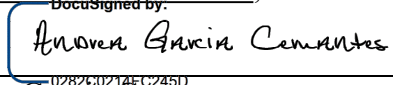
13. I reviewed and signed the Class Action and PAGA Settlement Agreement. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendants' defenses.

14. I have no conflicts of interest with any class member or the Settlement Administrator, ILYM Group, Inc.

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

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

Executed on 12/30/2024, at Fairfield, California.

DocuSigned by:

Andrea Garcia Cervantes
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PROOF OF SERVICE

Ochoa v. La Tavola, LLC, et al.
22CV000862

STATE OF CALIFORNIA)
) ss
COUNTY OF ORANGE)

I, Zeyra Ceballos, 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 15707 Rockfield Blvd., Suite 250, Irvine, California 92618. My electronic service address is zeyra.ceballos@wilshirelawfirm.com.

On **December 30, 2024**, I served the foregoing **DECLARATION OF PLAINTIFF ANDREA GARCIA CERVANTES IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL 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:

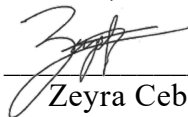
Annie Lau (SBN 302438)
alau@fisherphillips.com
Kiki Y. Okpala (SBN 341774)
kokpala@fisherphillips.com
Yorleny Hernandez
yhernandez@fisherphillips.com
Beth Gonshorowski
bgonshorowski@fisherphillips.com
FISHER & PHILLIPS LLP
One Montgomery Street, Suite 3400
San Francisco, California 94104
Telephone: (415) 490-9000
Facsimile: (415) 490-900

Attorneys for Defendants

- (X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor & Workforce Development Agency Online Filing Site.
- (X) **BY E-MAIL:** I hereby certify that this document was served from Irvine, 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.

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

Executed on **December 30, 2024** at Irvine, California.



Zeyra Ceballos