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Attorneys for Plaintiffs Rosalba Rios, Juan Sosa, and Fenix Valle, on behalf of themselves and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

ROSALBA RIOS, JUAN SOSA, AND
FENIX VALLE, on behalf of themselves and
all “aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

Plaintiffs,

v.

PASCHEN MANAGEMENT
CORPORATION, a California corporation,
and DOES 1 through 10, inclusive,

Defendants.

CASE NO: 56-2022-00570446-CU-OE-VTA

*Assigned to the Hon. Mark S. Borrell, Dept.
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**DECLARATION OF ROSALBA RIOS IN
SUPPORT OF UNOPPOSED MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004,
AWARDING ATTORNEYS’ FEES,
COSTS, SERVICE AWARD PAYMENTS,
AND REIMBURSEMENT OF
SETTLEMENT ADMINISTRATION
EXPENSES, AND DISMISSING ACTION
WITH PREJUDICE**

Date: March 13, 2024

Time: 8:30 A.M.

Dept.: 40

Complaint Filed: September 26, 2022

1 I, ROSALBA RIOS, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendant PASCHEN
3 MANAGEMENT CORPORATION (“Defendant”) and I submit this declaration in
4 support of Plaintiffs’ Unopposed Motion For An Order Approving Settlement Of Claims
5 Brought Pursuant To The Private Attorneys General Act Of 2004, Awarding Attorneys’
6 Fees, Costs, Service Award Payments, And Reimbursement Of Settlement Administration
7 Expenses, And Dismissing Action with Prejudice. I am a competent adult and worked for
8 Defendant as a non-exempt employee since August 2003. I have personal knowledge of
9 the facts set forth herein, and if called as a witness to testify to them, I could and would
10 do so competently.

11 2. I contacted my current attorneys when I questioned the employment
12 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to
13 act as a representative on behalf of other employees of Defendant in this action whom I
14 believed were being subjected to labor law violations. I pursued this case on a
15 representative basis so that I could help other employees recover for what I believed were
16 Defendant’s improper practices.

17 3. Specifically, I questioned Defendant’s policies of failing to pay all wages
18 due, to provide legally compliant meal and rest periods, or compensation in lieu thereof,
19 to issue accurately itemized wage statements, and to timely pay all wages due at the
20 separation of employment. Through many discussions with my lawyers, I learned these
21 may be illegal practices and Defendant’s employees might have recourse for them.

22 4. By bringing this lawsuit, and throughout its course, I have put the interests
23 of other employees ahead of my own. I understood that I could possibly earn an incentive
24 award if this case resolved itself favorably, but I also knew that I could also be responsible
25 for paying Defendant’s attorneys’ fees and costs if it did not.

26 5. My goal in bringing this lawsuit was to obtain a recovery on behalf of all
27 employees of Defendant, and even more importantly, to put an end to what I believed
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1 were illegal practices on the part of Defendant. I believe I have achieved both through
2 this lawsuit and settlement.

3 6. I am very happy about the results of this litigation. I am satisfied that
4 Defendant is compensating other PAGA Members and the State for penalties that I believe
5 we are due.

6 7. At the onset of this case, I spent time through numerous phone calls with
7 several of my attorneys explaining what I understood to be Defendant's policies and
8 practices and how they were applied to other employees. I kept actively involved with the
9 status of this case throughout the litigation process, tracking the status of the case and
10 participating as much as possible.

11 8. While I have not maintained detailed time records of my activities in
12 connection with this litigation, I believe that I have spent a total of approximately 22-27
13 hours assisting my attorneys with the preparation of this case and doing work and
14 investigation of the facts independent from my attorneys both before and during this case.

15 9. Before this litigation commenced, and throughout its course, I spent
16 approximately 3-4 hours gathering, organizing, and reviewing documents and information
17 for this lawsuit. I sifted through many of my own documents and reviewed information
18 produced by Defendant as part of this litigation.

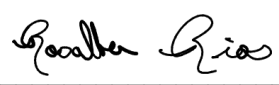
19 10. I communicated with my attorneys several times per month to track my
20 case's status. I have taken an active involvement in this matter throughout its course.

21 11. Taking the initiative with this case was very risky for me, both
22 professionally and financially. I put principal first and took a tremendous risk by filing
23 this lawsuit. I am quite confident that pursuing this lawsuit will result in future
24 reputational harm to me. There is a stigma associated with suing one's former employer.
25 I suspect I may be adversely affected when it comes to obtaining future employment –
26 employers who discover that I sued Defendant in a representative action will likely avoid
27 hiring me.
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I declare, under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed on 02 / 13 / 2024 at Ventura, California.



ROSALBA RIOS