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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 JUAN SOSA 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, JUAN SOSA, 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 from 2008 to December 2022. I have personal
9 knowledge of the facts set forth herein, and if called as a witness to testify to them, I could
10 and would do so competently.

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

17 3. I probed about Defendant’s policies of failing to pay all wages due, to
18 provide legally compliant meal and rest periods, or compensation in lieu thereof, to issue
19 accurately itemized wage statements, and to timely pay all wages due at the separation of
20 employment. Through a myriad of conversations with my lawyers, I learned these may be
21 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 forth this lawsuit was to obtain a settlement on behalf
27 of all employees of Defendant. In addition, and most important, I wanted to put an end to
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1 what I believed were illegal practices on the part of Defendant. I believe I have achieved
2 both through this lawsuit and settlement.

3 6. I am very pleased about the outcome 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. Since the beginning of this case, I spent time through many phone calls with
7 my attorneys explaining what I believed to be Defendant's policies and practices and how
8 they were applied to other employees. I was actively involved with the status of this case
9 throughout the litigation process, tracked the status of the case, and participated as much
10 as I could.

11 8. While I have not kept detailed time records of my activities in connection
12 with this litigation, I believe that I have spent a total of approximately 20-26 hours
13 assisting my attorneys with the preparation of this case and doing work and investigation
14 of the facts independent from my attorneys both before and during this case.

15 9. Before this litigation started, and throughout its course, I spent
16 approximately 2-5 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 spoke with my attorneys several times per month to track my case's status.
20 I have taken an active involvement in this matter throughout its course.

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


JUAN SOSA