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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 FENIX VALLE 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, FENIX VALLE, 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 May 2018 to May 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 contacted my attorneys when I queried the employment practices of
12 Defendant before starting this lawsuit. I took the opportunity to act as a representative on
13 behalf of other employees of Defendant in this action whom I believed were being
14 subjected to labor law violations. I pursued this case on a representative basis so that I
15 could help other employees recover for what I believed were Defendant’s improper
16 practices.

17 3. I inquired 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 commencing this lawsuit, and during its course, I have put the interests
23 of other employees ahead of my own. I recognized 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 aim in starting this lawsuit was to obtain a settlement on behalf of all
27 employees of Defendant. Additionally, and most important, I wanted to put an end to what
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1 I believed were illegal practices on the part of Defendant. I believe I have accomplished
2 both through this lawsuit and settlement.

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

6 7. Since the case started, I spent time through many phone calls with my
7 attorneys describing what I alleged to be Defendant's policies and practices and how they
8 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 complete and detailed time records of my activities
12 in connection with this litigation, I believe that I have spent a total of approximately 21-
13 27 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 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 communicated with my attorneys numerous times per month to track my
20 case's status. I have taken an active involvement in this matter throughout its course.

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


FENIX VALLE