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Attorneys for Plaintiff Vanessa Martinez

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

BRYAN M. KING, individually, and on
behalf of other members of the general
public similarly situated, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;
VANESSA MARTINEZ, individually,
and on behalf of other members of the
general public similarly situated;

Plaintiffs;

vs.

AMRAPUR OVERSEAS
INCORPORATED., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: CVRI2203348 (Lead Case)
Consolidated with Case No. CVRI2204557

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF VANESSA
MARTINEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Reservation ID: 869184205248
Date: December 15, 2025
Time: 8:30 a.m.
Department: 1

Complaint Filed: August 9, 2022
FAC Filed: October 2, 2024
Trial Date: None Set

DECLARATION OF VANESSA MARTINEZ

I, **Vanessa Martinez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned action entitled *Vanessa Martinez v. Amrapur Overseas, Inc.* in the Superior Court of California for the County of Riverside, Case No. CVRI2204557. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Amrapur Overseas, Inc. ("Defendant") as an hourly-paid, non-exempt clerk from approximately August 2017 to approximately January 2019. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for their practice of not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the pendency of the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering their questions, providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I frequently checked in with my attorneys and their staff to make sure that they had all my most current information and

1 any additional information that I had obtained.

2 4. As the case progressed, I was available to answer any questions my attorneys had
3 and remained available to speak and meet with my attorneys whenever they needed me. I
4 responded to them as quickly as possible and gave them as much information and identified as
5 many documents as I could. I spent time speaking with my attorneys about the case, identifying
6 potential witnesses, providing my attorneys with documents and information concerning the
7 case, and also describing policies, practices, and procedures of Defendant.

8 5. As far as the settlement is concerned, I was available to review documents and
9 answer any questions my attorneys had. I reviewed the settlement agreement, asked questions,
10 and discussed the potential settlement with my attorneys before signing the settlement
11 agreement.

12 6. I believe that I have done everything that my attorneys have asked of me and have
13 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
14 obtained in this case, and as a class representative, I respectfully request that the Court award me
15 an service payment in the amount of \$8,000.00 for my active participation in this case and taking
16 into account the broader general release of claims and California Civil Code section 1542 waiver
17 I am providing pursuant to the Settlement. Taking into consideration the time that I have
18 dedicated to this case, I believe that this amount is reasonable.

19 7. I am not related to anyone associated with Lawyers *for* Justice, PC or Brock & Gonzalez,
20 LLP.

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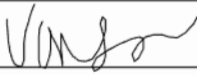
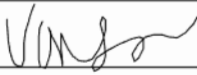
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1 8. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in this case. The only compensation I will receive is whatever amount
3 the Court awards as an enhancement award, as well as my share of the settlement as a class
4 member.

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

11/13/2025

7 Executed this ____ day of ____ 2025, at Corona, California.

8  2025-11-13 18:55:10 UTC - 18:55:10
9  cec08b22-4729-4105-9925-a294014781ca

10 Vanessa Martinez