

Edwin Aiwazian (SBN 232943)  
Arby Aiwazian (SBN 269827)  
Joanna Ghosh (SBN 272479)  
Vartan Madoyan (SBN 279015)  
**LAWYERS for JUSTICE, PC**  
410 West Arden Avenue, Suite 203  
Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ALONZO MAYA, individually, and on behalf  
of other members of the general public  
similarly situated

Plaintiff,

v.

FREUDENBERG MEDICAL, LLC, a  
Delaware limited liability company; and  
DOES 1 through 100, inclusive,

Defendants.

Lead Case No.: 22STCV38038  
Related Case No.: 22PSCV02421

Honorable Lawrence P. Riff  
Department 7

**CLASS ACTION**

**DECLARATION OF ALONZO MAYA  
IN SUPPORT OF PLAINTIFF'S  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

[Plaintiff's Motion for Preliminary Approval  
of Class Action Settlement; Declaration of  
Vartan Madoyan; and [Proposed] Order filed  
concurrently herewith]

Hearing Date: September 13, 2024  
Hearing Time: 1:45 p.m.  
Department: 7

Complaint Filed: December 5, 2022  
Trial Date: None Set

**DECLARATION OF ALONZO MAYA**

I, **Alonzo Maya**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the case entitled *Alonzo Maya v. Freudenberg Medical, LLC*, Los Angeles Superior Court Case No. Case No. 22STCV38038. 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 Defendant Freudenberg Medical, LLC as an hourly-paid employee and decided to seek legal advice about my work experiences with Defendant. 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 not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **10 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **18 hours** meeting with my attorneys regarding the matter and fulfilling my responsibilities as a named plaintiff and class representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys and answering their questions, providing information 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 routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the matter progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **5 additional hours** speaking with my attorneys about the

case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. As far as the settlement is concerned, I was available to ask questions and review documents. I spent about **4 hours** reviewing the settlement agreement and asking related questions before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class representative, I respectfully request that the Court award me a service payment in the amount of \$12,500.00 for my active participation in this case. Taking into consideration the significant time and effort that I have dedicated to this case, I believe that this amount is reasonable. In addition, the amount is reasonable because I have agreed to provide a general release of claims to Defendant, which no other employee is providing as part of this settlement.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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

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

Executed on 07/31/2024, at Los Angeles, California.

Electronically Signed: 2024-07-31 17:41:22 UTC - 35.150.144.95  
Alonzo Maya

Alonzo Maya