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Attorneys for Plaintiffs, CHARLENE AMERICA MURILLO
and ALONDRA TACHIQUIN, on behalf of themselves and
all others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

CHARLENE AMERICA MURILLO and
ALONDRA TACHIQUIN, as individuals,
and on behalf of all others similarly situated,

Plaintiffs,

v.

IKON MOTORSPORTS, INC., a California
corporation, SUITABLE STAFFING
SOLUTIONS, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 22STCV30656

[Assigned to the Hon. Kenneth Freeman in
Dept. 14]

**DECLARATION OF PLAINTIFF
ALONDRA TACHIQUIN IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

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1 7. I do not believe I was provided with opportunities to take full, uninterrupted 10-
2 minute rest periods while working with Defendants and am informed and believe my coworkers
3 were often not provided with such an opportunity, either.

4 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
5 an opportunity to take and am informed and believe that my coworkers were not provided
6 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute
7 rest periods, either.

8 9. Before and during the course of litigation, I was actively involved in assisting my
9 attorneys to support the wage and hour claims asserted. My involvement began before the initial
10 complaint was filed wherein, I provided first-hand knowledge and documentation as to
11 Defendants' practices, their ownership and corporate structure, and their wage and hour policies
12 and practices.

13 10. Part of the information I relayed was with regard to Defendants' timekeeping policies
14 and practices, and their meal and rest period policies and practices.

15 11. I provided them with all the documentation provided to me by Defendants during my
16 employment.

17 12. I assisted in reviewing time and payroll records with my attorneys, and informed
18 them of Defendants' employment policies, and whether those policies matched Defendants'
19 practices.

20 13. My attorneys called me to ask me questions over several times throughout the
21 litigation and I contacted my attorneys several times to stay updated on the case and offer my
22 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
23 during which I was available to be called to answer the questions posed by the mediator regarding
24 the asserted claims, as well as arguments raised by Defendants. In addition, I worked with my
25 attorneys over the next several weeks after mediation to understand and execute a long form
26 settlement agreement.

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1 14. Over the past several months since the case has been resolved, I have stayed in
2 touch with my attorneys to ensure that there was no undue delay in payment for other class
3 members for whom I brought this Action.

4 15. I believe that, through the present, I have spent at least 22 hours in connection with
5 this matter, which included time spent having preliminary calls with my attorneys; doing an intake
6 with my attorneys; time spent searching for documents relating to my employment; time spent
7 responding to informal discovery; time spent reading and understanding the Settlement
8 Agreement; time spent answering calls to discuss Defendants' timekeeping, pay, meal and rest
9 periods, and to review time and payroll records; time spent discussing with my attorneys
10 Defendants' policies and practices; time spent on-call at mediation; and time spent checking in on
11 the status of the case, among other things. I also spent time preparing this declaration to support
12 Plaintiffs' Motion for Preliminary Approval of Class and Representative Action Settlement.

13 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
14 rights of other employees who suffered from the same unfair wage practices. I felt that current
15 employees might not want to share their experiences with Defendants since they feared losing
16 their jobs. This is certainly understandable as I, too, have to provide for myself and others.

17 17. By bringing this lawsuit, I have put the interests of the class ahead of my own.

18 18. I understood that I could possibly earn a small enhancement if this case is resolved
19 favorably. I also knew that I could face retaliation from Defendants and backlash from former
20 coworkers who are loyal to Defendants.

21 19. I also had to provide a general release of claims and a waiver of rights under
22 California Civil Code section 1542 to Defendants as part of the settlement.

23 20. I understand that if I had brought this case individually, I may have earned more
24 compensation individually and on a much quicker timeline than the timeline it took to resolve this
25 Action.

26 21. I understood the substantial risks involved in serving as the Class Representative
27 and undertook these risks knowing there was no certainty regarding the outcome of the case.

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22. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and, even more importantly, to put an end to what I believe are illegal practices on the part of Defendants. I believe I have achieved both through this lawsuit and settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct this Jun 13, 2025 day of June 2025, at Rialto, California.


Alondra Tachiquin (Jun 13, 2025 16:09 PDT)
ALONDRA TACHIQUIN