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SUPERIOR COURT OF THE STATE OF CALIFORNIA

**FOR THE COUNTY OF RIVERSIDE
(UNLIMITED JURISDICTION)**

JOSE JESUS SANCHEZ,

Plaintiff,

vs.

JSJ FOODS, INC.; JEFFREY BARNES;
SHIRLEY BARNES; and DOES 1 to 25,
inclusive

Defendants.

Case No.: CVRI2403294

**DECLARATION OF JOSE JESUS
SANCHEZ IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Action filed: June 10, 2024
Hearing Date: February 3, 2025
Hearing Time: 8:30 a.m.
Hearing Dept: 1, Hon. Harold W. Hopp

Submitted Herewith Under Separate Cover:

1. Plaintiff's Notice of Unopposed Motion and Motion for Approval of PAGA Settlement;
2. Declaration of Harout Messrelian;
3. Declaration of Michael Moore;
4. [Proposed] Order

DECLARATION OF JOSE JESUS SANCHEZ IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, JOSE JESUS SANCHEZ, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Harout Messrelian of Messrelian Law, Inc. in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendants on or around August 2020 as a cook. My employment with Defendants ended when I was terminated on or around July 20, 2022.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that JSJ Foods, Inc., Jeffrey Barnes, and Shirley Barnes (collectively "JSJ" or "Defendants") are the Defendants. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other JSJ employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not provided all required meal and rest periods. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other JSJ employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing JSJ. I agreed that I would do what is in the best interests of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at JSJ was like, explaining what my employment at JSJ had in common with other employees who

1 worked for JSJ, explaining my claims to my attorneys, and communicating with my attorneys
2 about the settlement agreement and related documents. Despite this, I am **not** asking for a service
3 award for my involvement and the time I spent assisting my counsel with the PAGA action.

4 6. I negotiated an individual settlement of my potential wrongful termination and
5 individual wage and hour claims in the amount of \$5,000.00 after the Parties had agreed to the
6 Settlement of the PAGA action.

7 7. As part of my individual settlement, I signed a general release of all claims,
8 whether known or unknown, that I may have against Defendants, not only PAGA claims.

9 8. I don't believe that my individual settlement has any bearing on whether I have
10 served the Aggrieved Employees' best interests and will continue to do so.

11 I declare under the penalty of perjury of the laws of the State of California that the
12 foregoing is true and correct to the best of my knowledge.

13 Executed on November 6, 2024 at Perri s, California.

14 
15 JOSE JESUS SANCHEZ,
16 Declarant