

MESSRELIAN LAW INC.

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Attorneys for Plaintiff,

IRIS RODRIGUEZ, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

(UNLIMITED JURISDICTION)

IRIS RODRIGUEZ,

Plaintiff,

vs.

FACILITY MASTERS, INC.; and

DOES 1 to 25, inclusive,

Defendants.

Case No.: 23CV423999

**DECLARATION OF IRIS RODRIGUEZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT AND
RELEASE**

Action filed: October 9, 2023

Hearing Date: March 13, 2024

Hearing Time: 1:30 p.m.

Hearing Dept: 19, Hon. Theodore C.

Zayner

DECLARATION OF IRIS RODRIGUEZ IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, IRIS RODRIGUEZ, 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 Facility Masters, Inc. in or around 2019 as a janitor. My employment with Facility Masters, Inc. ended on or around November 3, 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 Facility Masters, Inc. ("Facility Masters") is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other Facility Masters employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as uniforms. 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 Facility Masters 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 Facility Masters. I agreed that I would do what is in the best interest 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

1 Facility Masters was like, explaining what my employment at Facility Masters had in common
2 with other employees who worked for Facility Masters, explaining my claims to my attorneys,
3 and communicating with my attorneys about the settlement agreement and related documents.
4 Despite this, I am **not** asking for a service award for my involvement and the time I spent
5 assisting my counsel with the PAGA action.

6 6. I negotiated an individual settlement of my individual wage and hour claims,
7 sexual harassment, and wrongful termination claims after the Parties had agreed to the
8 Settlement of the PAGA action.

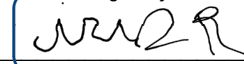
9 7. As part of my individual settlement, I signed a general release of all claims,
10 whether known or unknown, that I may have against Defendant, not only PAGA claims.

11 8. I don't believe that my individual settlement has any bearing on whether I have
12 served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am
13 willing to provide it to the Court *in camera* if the Court so requests.

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

16 Executed on February 16, 2024 at 16/02/24
17 San Francisco, California.

DocuSigned by:



18 IRIS RODRIGUEZ,
19 Declarant