

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Peter J. Carlson, Esq. [CSB No. 295611]
peter@lmlfirm.com
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Mehrdad Bokhour, Esq., CA Bar No. 285256
mehrdad@bokhourlaw.com
BOKHOUR LAW GROUP, P.C.
1901 Avenue of the Stars, Suite 920
Los Angeles, California 90067
Tel: (310) 975-1493; Fax: (310) 675-0861

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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

YVONNE LABRA and ANABEL
MADRIGAL, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

PENN EMBLEM COMPANY, a
Pennsylvania Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CVRI2300385
*[Assigned to Hon. Harold Hopp, Dept 1, for all
purposes]*

**DECLARATION OF PLAINTIFF
YVONNE LABRA IN SUPPORT OF
PRELIMINARILY APPROVING
CLASS ACTION AND PAGA
SETTLEMENT;**

Hearing
Date: June 5, 2025
Time: 8:30 a.m.
Dept.: 1

DECLARATION OF YVONNE LABRA

I, Yvonne Labra, state and declare:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein, and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement.

2. I believe the settlement is fair and reasonable and constitutes a fair resolution of the alleged claims.

3. During my employment with Defendant, several issues concerned me, which I thought did not comply with California law, such as not being paid all minimum and overtime wages, being provided proper meal periods and rest breaks, failure to pay vested vacation, wage statement violations; failure to timely pay final wages; unfair competition; and PAGA penalties. Even though I was unsure if I wanted to bring a lawsuit because of the risk of stepping forward as a whistle-blower (since this could jeopardize my livelihood in the industry and make it difficult to find future jobs), I retained my attorneys to proceed with this class action because I did not think that I or the other employees were being treated correctly.

4. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating actively in the lawsuit, including deposition, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

5. I respectfully request that the court approve the service award for the following reasons.

6. First, I have worked on this case and performed substantial services for the Class to help obtain a highly beneficial settlement for my fellow employees.

7. On or about January 20, 2023, I initiated a Class Representative Action Complaint in the Superior Court of California, Sacramento County. This action represents my

1 interests and that of all other current and former non-exempt employees similarly situated.
2 Subsequently, the complaint was amended to include a cause of action under the Private
3 Attorney General Act (“PAGA”) on behalf of myself, the State of California, and other similarly
4 aggrieved employees.

5 8. Since initiating this action, I estimate I have spent approximately 35-40 hours
6 engaging in activities to benefit the class. I have assisted my attorneys in numerous ways,
7 including helping to explain and discuss the company’s practices and their general practices
8 and procedures, locating and analyzing company documents, and communicating with other
9 class members. These efforts occurred through numerous meetings with Class Counsel,
10 telephone conferences, letters, emails, and text communications. I also spent substantial time
11 assisting with the preparation for mediation.

12 9. My work also continued after mediation, as I reviewed settlement agreements
13 and other settlement documents and continued communication with my lawyers during the
14 settlement approval processes.

15 10. Second, I respectfully request that the Court approve the agreed-upon service
16 award because I agreed to set aside my personal interests and put the class's interests ahead or
17 on par with my own. In doing so, and by successfully bringing this case as a class action, I
18 helped to obtain a highly beneficial settlement for the class members.

19 11. Third, as a condition of this class action settlement, I was required to release and
20 waive all possible individual claims against the company, something that none of the other class
21 members were required to give up.

22 12. Fourth, by bringing this case as a class action, I undertook significant risks and
23 stresses at a high emotional cost without any guarantee of success. For example, filing this
24 lawsuit and being a whistle-blower was stressful daily, as I constantly worried about the risk
25 that this case could impact my ability to find future jobs. This stress/risk lasted for the entire
26 case, and I’m worried it may make it hard to find a job in the future since the case information
27 is all available online.

28 13. Fifth, bringing this case also came with a major financial risk because, if I lost

1 the case, I would be required to pay the company's costs, and there was a chance they could try
2 to make me pay their attorneys' fees as well.

3 14. I affirm my unwavering dedication to representing the interests of the putative
4 class and aggrieved employees. I voluntarily assumed considerable risks and expended
5 considerable effort to secure a favorable outcome. I trust that the Court will duly consider my
6 request for a Service Award in recognition of these contributions.

7
8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct. Executed on 5/5/2025, at Yvonne Labra, California.

10 DocuSigned by:

11 *Yvonne Labra*

457AE35CA03A484...

Yvonne Labra