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13 Attorneys for Plaintiff ADOLFO GUADARRAMA DIAZ,
14 individually and on behalf of others similarly situated

15
16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17
18 **FOR THE COUNTY OF LOS ANGELES**

19 ADOLFO GUADARRAMA DIAZ,
20 individually and on behalf of others similarly
21 situated,

22 Plaintiff,

23 vs.

24 REPUBLIC NATIONAL SECURITY,
25 THOMAS W. KEMP, ADELA KEMP, and
26 DOES 1 through 50,

27 Defendants.

28 CASE NO.: 23STCV03317

CLASS ACTION

Assigned For All Purposes To:

Judge: Hon. Stuart M. Rice

Dept.: 1

**DECLARATION OF PLAINTIFF
ADOLFO GUADARRAMA DIAZ IN
SUPPORT OF MOTION FOR APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Complaint Filed: February 15, 2023

1 I, Adolfo Guadarrama Diaz, hereby declare:

2 1. I have personal knowledge of the following and if called as a witness, I could and
3 would competently testify thereto.

4 2. I am a plaintiff in this lawsuit, and I submit this declaration in support of motion for
5 approval of the class claims and civil penalties under the Labor Code Private Attorneys General
6 Act ("PAGA") alleged in this action against Defendants Republic National Security, Thomas W.
7 Kemp, and Adela Kemp ("Defendants").

8 3. I was employed by Defendants as a non-exempt employee in California.

9 4. In around December 2022, I contacted the Majarian Law Group regarding potential
10 claims against Defendants. After an initial consultation, I met with Justian Jusuf of Law Office of
11 Justian Jusuf and discussed with him the employment practices of Defendnats, particularly in
12 regard to wage payments, wage statements, meal and rest breaks, and related issues.

13 5. When I decided to start a lawsuit as a class action, I understood that I was not only
14 seeking recovery for myself, but also for all other current and former non-exempt employees who
15 had been subjected to the same employment practices. I understood that I could not put my
16 interest above those of the class members, and that my recovery could be delayed significantly.

17 6. I also understood that I might be held responsible for some or all of Defendants'
18 costs in defending the case, if the case was not successful. Notwithstanding the risks, I was
19 willing to go forward and represent the class.

20 7. I had numerous discussions with Mr. Jusuf before and after the filing of the
21 complaint in this action.

22 8. I learned that a large amount of work was required of me as a class representative,
23 such as responding to any discovery requests from Defendants, and I was willing to engage in the
24 work. I spent substantial amount of time describing Defendants' policies and practices. I spoke
25 with Mr. Jusuf and his assistant on a regular basis for the status of the proceedings. In total I have
26 spent a total of approximately 50 (fifty) hours in this lawsuit.

27 9. Once the settlement was agreed upon and the settlement paperwork was finalized, I
28 reviewed the documents with my attorney and discussed the procedure, and then I signed the

settlement documents.

10. I believe the settlement provides substantial benefit to those employed by the Defendants as non-exempt employees for the claims asserted in this action.

11. I believe the settlement should be approved, because I believe the terms of the settlement are fair and reasonable, and represent substantial benefit to the class members.

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

Executed on May 07, 2024 at Tarzana, California.

Adolfo Guadarrama
Adolfo Guadarrama Diaz