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Attorneys for Plaintiff, ANTHONY GONZALEZ,
on behalf of himself and all others similarly situated,
and on behalf of the general public.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ANTHONY GONZALEZ on behalf of
himself, all others similarly situated, and
on behalf of the general public,

Plaintiff,

v.

ALMANSOR COURT, INC.; AND
DOES 1-100,

Defendants.

Case No.: 23STCV12272

**DECLARATION OF ANTHONY
GONZALEZ IN SUPPORT OF
SETTLEMENT APPROVAL**

1 I, Anthony Gonzalez, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could
3 and would competently testify thereto, except as to those matters stated upon information
4 and belief, and as to those matters, I believe them to be true.
- 5 2. I am the named Plaintiff in the above-captioned lawsuit, and I submit this declaration in
6 support of settlement approval.
- 7 3. I worked for Defendant Almansor Court, Inc. ("Almansor") as a non-exempt, hourly
8 employee in California during the PAGA Period.
- 9 4. Since becoming a named plaintiff, I have diligently worked on this case. I always
10 answered phone calls from my attorneys or called them back promptly when they called.
11 I also promptly responded to emails sent by my attorneys. On many occasions, I spoke
12 with my attorneys for case related purposes. I assisted my attorneys in investigating the
13 case and. I have worked diligently to help progress the case.
- 14 5. I was aware that, at some point in this case, I would have my deposition taken. I knew that
15 the deposition could take a full day and that I may have to meet with my attorneys prior
16 to my deposition. I was at all times ready and willing to sit for my deposition.
- 17 6. Although I did not attend the mediation in person, I was available on the phone for all the
18 negotiations, which I was kept apprised of and assisted in. I gave my consent to settle with
19 Almansor for the gross settlement amount of \$250,000. I completely and carefully
20 reviewed the memorandum of understanding and the settlement agreement. I then signed
21 both the memorandum of understanding and settlement agreement.
- 22 7. As part of the settlement agreement, I agreed to a general release of my claims against
23 Almansor. This includes a release for my own individual wage and hour claims. I believe
24 the requested \$10,000 for my agreeing to this release, which is broader than the claims
25 being released by the other aggrieved employees, who can still bring their own claims
26 against Almansor, is fair and reasonable.
- 27 8. I have and will continue to adequately represent all of the interests of the other aggrieved
28 employees. With my status as the representative plaintiff, I will treat the interests of the

1 other aggrieved employees above my interests.

2 9. I recognize that any resolution of this matter must be approved by the Court in terms of
3 whether the settlement is fair and reasonable and will not prevent me from protecting the
4 interests of all of aggrieved employees for the PAGA Period.

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

7
8 Dated: 7/11/2024

DocuSigned by:
By: Anthony Gonzalez
03D362066 Anthony Gonzalez