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Attorneys for Plaintiffs Salvador Rodriguez, German Rodriguez and all other current and former employees similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT**

**SALVADOR RODRIGUEZ, GERMAN
RODRIGUEZ**, on Behalf of Themselves and
All Other Current and Former Employees
Similarly Situated,

Plaintiffs,

v.

WNU LLC DBA PAPA JOHNS, a
Washington Limited Liability Company,
PAUL URBINA, BRISIA OCHOA,
Individuals, and **DOES 1 to 50, Inclusive.**

Defendants.

CASE NO. 23STCV28934

*Assigned for All Purposes to the Honorable
William F. Highberger*

Dept. No. 10

**DECLARATION OF SALVADOR
RODRIGUEZ IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Hearing Date: October 28, 2025

Hearing Time: 10:30 AM

Place: Dept. 10

Action Filed: November 22, 2023

Trial Date: Not Set

1 **I, SALVADOR RODRIGUEZ, declare as follows:**

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify,
3 I could and would do so competently under oath. I make this declaration in support of
4 Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement.

5
6 2. I worked for Defendants WNU LLC DBA Papa Johns ("Papa Johns") a Washington
7 Limited Liability Company, Defendant Paul Urbina ("Urbina"), and Brisia Ochoa
8 ("Ochoa") collectively herein referred to as ("Defendants") as a non-exempt employee from
9 on or about May 3, 2022 until March 29, 2023.

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11 3. Through my attorneys, Plaintiff German Rodriguez and I filed a class action lawsuit
12 on or about November 22, 2023 on behalf of myself and all other current and former
13 employees similarly situated of Defendants who did not receive their minimum wages, their
14 overtime wages, their meal and rest breaks, their accurate itemized wage expenses, their
15 split shift premiums, and who were not reimbursed for necessary business expenses.

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17 **Worked Performed in this Case**

18 4. With respect to the work I performed on the case, I participated in many
19 conversations with both Eli M. Kantor, Esq. and Jonathan D. Kantor, Esq. via e-mail, phone,
20 and in-person meetings, and provided my attorneys with information related to my working
21 conditions with Defendants, and Defendants company structure and operations. I also
22 provided my attorneys with the contact information of my co-workers. I reached out to my
23 co-workers and told them to contact my attorneys.
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1 5. I spent considerable time searching for documents and sent everything that I found to
2 my attorneys. In this regard, I sent my attorneys the following items: my wage statements,
3 documents I had received during work, text messages and emails wherein I complain about
4 not receiving lunch breaks and rest breaks, my coworkers' contact information, contact
5 information of employees at other stores, and information about the Defendants. I also
6 provided the following information over the telephone to my attorneys: mileage that I did
7 not get reimbursed for, the amount of my phone bill and how often I used it during my
8 employment with Defendants.

10 6. I assisted my attorneys in preparing for the mediation, and I actively participated in
11 the mediation. During the course of this case, I contacted my attorneys regularly for updates
12 on the status of the case. In preparation for the mediation, I contacted my attorneys and we
13 spoke about the strengths and weaknesses of the case and I assisted them in evaluating the
14 claims and the potential class-wide damages for use at that mediation.

16 7. After the mediation, I reviewed the settlement agreement and discussed the terms
17 with my attorneys. Based on my review of the settlement terms, conversations with my
18 attorneys about the strengths and weaknesses of the claims and my understanding of the
19 Defendants' operations, I believe the settlement in the case is fair and adequate and in the
20 best interest of the members of the putative class that are covered by the settlement.

23 **Risks and Responsibilities of Filing the Lawsuit**

24 8. When I decided to become involved in this lawsuit as a Class Representative, I
25 understood that I was not only seeking compensation for myself, but also for all other class
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1 members who worked for Defendants, and that by doing so, I would be delaying more
2 immediate recovery available to me through the Labor Commissioner's office or by an
3 individual lawsuit.

4 9. I was also made aware that being a named Class Representative in a class action filed
5 on behalf of others would subject me to a stigma that is sometimes associated with those
6 who bring these kinds of lawsuits. I was aware that, as a Class Representative, I might be
7 responsible for some or all of the Defendants' legal costs if the case was not successfully
8 concluded. Even with knowledge of these risks, I was willing to go forward and to act on
9 behalf of the class, but I was nervous about losing and having a judgment filed against me
10 for costs, or losing job opportunities in the future.

13 10. I understood that there were risks involved in class action lawsuits. I understood that
14 the lawsuit could continue for several years and require my services and attention the entire
15 length of the lawsuit. I learned that even if we won at trial, the case could still be further
16 delayed by appeals.

18 11. Additionally the notice of settlement in this case will be sent to all of Defendants'
19 current and former employees. The notice will inform all of these employees that I filed a
20 class action lawsuit against the company. Exposing myself to this kind of publicity creates a
21 risk for my future career prospects, since employees of Defendants may move to different
22 companies within the industry or may know people at other companies within the industry
23 who do not want to hire someone who sued someone who hired him.

1 12. I agreed to participate actively in the lawsuit and to assume the risks of serving as a
2 named Plaintiff and have done so here. I have provided documents to my attorneys, attended
3 many meetings with my attorneys and I have attended and actively participated in the
4 mediation.

5
6 13. During our many conversations, and partly in response to my numerous questions,
7 my attorneys educated me about the phases of class action litigation, the strategies for
8 prosecuting each phase, and the risks associated with executing those strategies. When I
9 retained my attorneys and agreed to serve as a Class Representative, I understood that I
10 would be representing not only myself, but also a class of employees like myself. I took this
11 responsibility seriously, by agreeing to bring this action, I formally accepted the
12 responsibilities of representing the interests of all class members and willingly chose to
13 assume risks and potential costs that I alone might have to bear.

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16 14. As a class representative, I faithfully represented the interest of the class to the best
17 of my abilities and put the interests of the class before my own interests. There are many
18 other people that faced the same problems with Defendants that I did, and I understood the
19 importance of this case and the necessity that all class members benefit from the lawsuit
20 equally. I understood the duties and responsibilities of a class representative.

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22 15. I understood that my statements and actions in this case could affect other class
23 members. The way I think of it is that if I work hard on the case and do a good job, it could
24 help the case against Defendants and help all the employees who are similarly situated to
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1 me. I therefore have taken extra precaution at every step to ensure that my actions best
2 represented the class above and beyond my own interests and stake in the lawsuit.

3 16. I have understood that this is a substantial burden that I have undertaken in order to
4 represent the class in this case.

5 17. As a class representative, I have actively participated in the lawsuit as detailed above.
6 I have also regularly kept in contact with my attorneys, Eli M. Kantor, Esq. and Jonathan D.
7 Kantor, Esq. throughout this lawsuit.

8 18. I followed the progress of the lawsuit and provided all relevant facts to my lawyers if
9 any were needed. I further understood that the settlement in this case must be focused on
10 benefiting the class as a whole and not just myself. I therefore did not agree to any
11 settlement that, either in my view or my attorneys' view, was not fair to the class. I spoke
12 with Class Counsel many times about the frequency of the violations that I experienced and
13 also about the amount of money I thought would be fair if we did settle the case.

14 19. I understand my obligation of being an adequate class representative, and I
15 understand that I owe a fiduciary obligation to the class members in my position as a class
16 representative. I am willing to act as a fiduciary for absent class members.

20 **Incentive Award**

21 20. I believe that I have done everything my attorneys have asked of me, and I have tried
22 to represent the class to the best of my ability.
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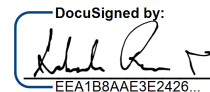
21. Based on my understanding of the facts and law, it is my belief that the Class Settlement and the proposed award of \$10,000 for my services as Class Representative is fair.

22. I think my efforts helped to get the result obtained in this case. I further understand that this additional payment is not guaranteed and is subject to Court approval. Taking into consideration the time I dedicated to this case and the results achieved through the settlement, I believe that the requested award is reasonable. My opinion about the fairness and adequacy of the settlement in the case is not based on this potential payment.

23. I am not aware of any interests I have that are adverse to the interests of the proposed Class members, and I do not have any conflicts that would keep me from adequately representing the class. I remain committed to prosecuting this case vigorously on behalf of the Class.

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

Dated 7/29/2025

DocuSigned by:

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 SALVADOR RODRIGUEZ