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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES -TORRANCE COURTHOUSE

ARLENE PARRA, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

MARKSMAN SECURITY CORPORATION,
a Florida corporation; and DOES 1 through
100, inclusive,

Defendants.

CASE NO.: 23TRCV01864

Honorable Alan B. Honeycutt
Department E

**DECLARATION OF PLAINTIFF
SHALOMA SMITH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

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1 pay for not being provided with the opportunity to take full, uninterrupted 10-minute rest periods,
2 either.

3 8. Before and during the course of litigation, I was actively involved in assisting my
4 attorneys to support the wage and hour claims asserted. My involvement began before the initial
5 complaint was filed wherein, I provided first-hand knowledge and documentation as to Defendant's
6 practices, its ownership and corporate structure, and their wage and hour policies and practices.

7 9. Part of the information I relayed was with regard to Defendant's timekeeping policies
8 and practices and their meal and rest period policies and practices.

9 10. I provided them with all the documentation provided to me by Defendant during my
10 employment.

11 11. I assisted in reviewing time and payroll records with my attorneys and informed them
12 of Defendant's employment policies and whether those policies matched Defendant's practices.

13 12. My attorneys called me to ask me questions over several times throughout the
14 litigation and I contacted my attorneys several times to stay updated on the case and offer my
15 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
16 during which I was available to be called to answer the questions posed by the mediator regarding
17 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my
18 attorneys over the next several weeks after mediation to understand and execute a long form
19 settlement agreement.

20 13. Over the past several months since the mediation has been resolved, I have stayed in
21 touch with my attorneys to ensure that there was no undue delay in payment for other similarly
22 aggrieved employees for whom I brought this Action.

23 15. I believe that, through the present, I have spent at least 26 hours in connection with
24 this matter, which included time spent having preliminary calls with my attorneys; doing an intake
25 with my attorneys; time spent searching for documents relating to my employment; time spent
26 reading and understanding the Settlement Agreement; time spent answering calls to discuss
27 Defendant's timekeeping, pay, meal and rest periods, and to review time and payroll records; time
28 spent discussing with my attorneys' Defendant's policies and practices; time spent on-call at

1 mediation; and time spent checking in on the status of the case, among other things. I also spent
2 time preparing this declaration to support Plaintiff's Motion for Approval of PAGA Action
3 Settlement.

4 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
5 rights of other employees who suffered from the same unfair wage practices. I felt that current
6 employees might not want to share their experiences with Defendant since they feared losing their
7 jobs. This is certainly understandable as I, too, have to provide for myself and others.

8 17. I understood that I could face retaliation and backlash from former coworkers and
9 others who are loyal to Defendant. I have also had to provide a general release of claims and a
10 waiver of rights under California Civil Code Section 1542 to Defendant as part of the settlement.

11 18. By bringing this lawsuit, I have put the interests of the other similarly aggrieved
12 employees ahead of my own.

13 19. My goal in bringing this lawsuit was to obtain a recovery on behalf of the similarly
14 aggrieved employees, and, even more importantly, to put an end to what I believe are illegal
15 practices on the part of Defendant. I believe I have achieved both through this lawsuit and
16 settlement.

17 20. I understand the obligations of adequately representing the non-exempt, hourly paid
18 employees of the Defendant.

19 21. I understand the substantial burden I will have to undertake in order to represent the
20 non-exempt, hourly paid employees of the Defendant.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing
22 is true and correct this 14 day of January 2026, at Bellflower, California.

23
24 Shaloma Sheba Smith
SHALOMA SMITH