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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

CONRAD MARTINEZ, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;
CHARLENE RUEDAS, individually, and on
behalf of other members of the general public
similarly situated; WILLIAM YOUAKUM,
individually, and on behalf of other members
of the general public similar situated;

Plaintiffs,

vs.

SOLID SOLUTIONS 24/7, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 34-2020-002286636-CU-OE GDS

Honorable Laurie A. Damrell
Department 22

CLASS ACTION

**DECLARATION OF WILLIAM
YOUAKUM IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Selena Matavosian); Declarations
of Proposed Class Representatives (Conrad
Martinez and Charlene Ruedas); and
[Proposed] Order filed concurrently
herewith]

Date: June 7, 2024
Time: 9:00 a.m.
Department: 22

Complaint Filed: October 6, 2020
FAC Filed: April 6, 2023
Trial Date: None Set

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1 case, identifying potential witnesses, providing my attorneys with documents and information
2 concerning the case, and also describing policies, practices, and procedures of Solid Solutions.

3 5. As far as the settlement is concerned, I was available to review documents and
4 answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement
5 agreement and about **5 hours** asking questions and discussing the potential settlement with my
6 attorneys before signing the settlement agreement.

7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
9 obtained in this case, and as a class representative, I respectfully request that the Court award me
10 an enhancement payment in the amount of \$10,000.00 for my active participation in this case.
11 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
12 reasonable.

13 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

14 8. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this case. The only compensation I will receive is whatever amount
16 the Court awards as an enhancement payment, as well as my share of the settlement as a class
17 member.

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

20 Executed this ^{William Youakum} day of February 2024, at Rio Linda, California

21 Electronically Signed  2024-02-28 20:48:11 UTC - 73.140.108.132
VeriText AssureSign® 33434687-c703-411f-9d1e-b12401510907

22 William Youakum