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15
16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **COUNTY OF RIVERSIDE**

18 PEDRO CEDENO, as an individual on behalf
19 of himself and on behalf of all others similarly
20 situated,

21 Plaintiff,

22 vs.

23 SANNIPOLI CORPORATION, a
California Corporation; MATTHEWS
INTERNATIONAL CORPORATION, a
24 Pennsylvania Corporation; THE YORK
GROUP, INC., a Delaware Corporation; and
25 DOES 1-100, inclusive,

26 Defendants.

) Lead Case No. CVRI2303826
)
) [Consolidated with Case Nos. CVRI2304132;
) CVRI2304915; and CVRI2306853]
)
) Assigned for All Purposes To:
) Judge: Harold W. Hopp
) Dept: 1
)
) **DECLARATION OF PEDRO CEDENO**
)
) **Date: January 15, 2025**
Time: 8:30 a.m.
Dept. 1

1 I, ADRIAN AGUILAR, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiff's Motion for Final Approval of Class Action Settlement.

5 2. I worked for defendants as a general laborer and quality control inspector from in or
6 around April 2022, through April 25, 2023. I worked at the Menifee, California location. While I
7 worked there I don't think I was paid for all hours that I worked because my time was rounded off
8 and I believe I was shorted a few minutes of work time because of this. I also don't think I
9 received all of the meal and rest breaks I was entitled to, especially second lunches and third breaks
10 on longer shifts of more than 10 hours. I also had to use my own phone for company business and I
11 never received any reimbursement.

12 2. I decided to file this lawsuit because I did not feel that I was treated fairly as an
13 employee of Defendant, especially with regard to me not receiving all of the pay I believe I earned,
14 for not getting all of my lunches and other breaks, and not getting anything for using my own
15 phone and tools.

16 4. It is my understanding this lawsuit could not have been prosecuted or settled on
17 behalf of the Class unless I or some other current or former employee decided to serve as a named
18 plaintiff and proposed class representative. In deciding to serve as a named plaintiff and proposed
19 class representative in this case, I understood that my name could be publicly attached to this
20 lawsuit and that my work experiences to some extent would be set forth in a public court file. I
21 recognized I would need to devote a certain amount of time that I could have spent otherwise. I
22 also recognized my bringing the lawsuit carried some degree of risk for defendants' legal costs
23 among other things. Despite this, I decided to serve as the named plaintiff and proposed class
24 representative, without any promise of recovery or compensation.

25 5. I am familiar with the work involved in prosecuting this case. I have participated in
26 meetings, phone calls, and other communications with my lawyers regarding this case. I am
27 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
28 events in this case, including the investigation performed by my lawyers, the mediation with

1 Defendant that resulted in this settlement, and the preparation of settlement papers and the need to
2 obtain court approval of the proposed settlement. I participated in the litigation and provided my
3 lawyers with information and documents regarding my employment with Defendant.

4 6. I believe that the proposed class-wide settlement obtained on behalf of the Class and
5 other aggrieved employees is excellent in view of the issues and risks involved with the case.

6 7. I believe I have fulfilled my duties as a proposed class representative, which
7 required a significant amount of time and effort during the course of this case. These efforts
8 required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
9 communicating with my attorneys to stay informed of ongoing developments in the case and to
10 discuss the proposed settlement ultimately negotiated; (b) searching for and providing documents
11 and other materials relating to my work experience; (c) responding to requests for information
12 relating to my work experience; and (d) reviewing filings and key documents including drafts of
13 the complaint and the settlement agreement. These tasks required my dedication of at least 15-20
14 hours of my time, which time I honestly could have spent on family, personal time, or work. My
15 understanding is that future tasks may require several more hours of my time. Further, at all times I
16 was ready, willing and able to testify at deposition and/or trial. I believe I have been diligent and
17 that I have acted above and beyond that of which is expected of a named plaintiff and proposed
18 class representative to date and will continue to do so. To the best of my knowledge I have not
19 conflicts of interest of any kind with any other class member.

20 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
21 named plaintiff and proposed Class Representative, and in consideration for my general release of
22 all claims against Defendant. I believe that amount is fair and reasonable in view of the work I
23 have and will continue to perform on behalf of the Class. I believe that my role as the class
24 representative in this lawsuit has resulted in a valuable benefit to the Class Members, and I
25 accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful in
26 this lawsuit. I believed in this case, so I was willing to be the named plaintiff and proposed class
27 representative to risk this and pursue this class action litigation. I also accepted the risk that news of
28 this lawsuit could also potentially impact my ability to secure other work.

1 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
2 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

3 I declare under penalty of perjury under the laws of California that the foregoing is true and
4 correct. Executed on 12 / 18 / 2024, at Murrieta, California.
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