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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JAMIE SANDOVAL and VICTOR
RODRIGUEZ, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiffs,

vs.

NEILL AIRCRAFT CO., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 21STCV29248

Honorable Elihu M. Berle
Department 6

CLASS ACTION

**DECLARATION OF VICTOR
RODRIGUEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action and
PAGA Settlement; Declaration of Proposed
Class Counsel (Vartan Madoyan);
Declaration of Proposed Class Representative
(Jamie Sandoval); and [Proposed] Order filed
concurrently herewith]

Date: October 9, 2024
Time: 9:00 a.m.
Department: 6

Complaint Filed: August 9, 2021
FAC Filed: February 15, 2022
Trial Date: None Set

DECLARATION OF VICTOR RODRIGUEZ

I, **Victor Rodriguez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Neill Aircraft Co. ("Neill Aircraft") as an hourly-paid, non-exempt employee during the Class Period. I decided to seek legal advice about my work experiences with Neill Aircraft and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Neill Aircraft was held accountable for not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **2.5 hours**. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for **6 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to join a lawsuit as a named plaintiff, class representative, and, eventually, a PAGA representative.

3. I have spent over **13 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Neill Aircraft, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Neill Aircraft. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

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4. Throughout the case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **8 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Neill Aircraft.

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

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$5,000.00 for my active participation in this case. Taking into consideration the significant time and effort that I have dedicated to this case, including time spent on discovery and for agreeing to provide a general release to Defendant, I believe that this amount is reasonable.

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

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

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

Executed on 08/01/2024, at Carson, California.

Electronically Signed
2024-08-02 05:09:16 UTC - 146.75.146.78
Nintex AssureSign®
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Victor Rodriguez