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

MARIO RODRIGUEZ, 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;

Plaintiff,

vs.

V&H PERFORMANCE, LLC, an unknown
business entity; VANCE & HINES, an
unknown business entity; MOTORSPORT
AFTERMARKET GROUP, INC., a
Delaware corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 23STCV21131

Honorable Samantha P. Jessner
Department 7

CLASS ACTION

**DECLARATION OF MARIO RODRIGUEZ
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Complaint Filed: August 31, 2023
FAC Filed: April 10, 2024
Trial Date: None Set

DECLARATION OF MARIO RODRIGUEZ

I, Mario Rodriguez, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff 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 V&H Performance, LLC, Vance & Hines, and Motorsport Aftermarket Group, Inc. (collectively, "Defendants") from approximately July 2021 to approximately August 2022 as an hourly-paid employee. I decided to seek legal advice about my work experiences with Defendants 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 Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC 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 be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, 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 Defendants. 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.

4. Throughout this matter, 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

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent time speaking with my attorneys about the case, identifying
3 potential witnesses, providing my attorneys with documents and information concerning the case,
4 and also describing policies, practices, and procedures of Defendants.

5 5. As far as the settlement is concerned, I was available to review documents and
6 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
7 Settlement Agreement and discussed the questions I had regarding the potential settlement with
8 my attorneys before signing the settlement papers.

9 6. I understand that a settlement has been reached in my case and what my duties
10 and responsibilities are as a class and PAGA representative. For example, I am aware that if the
11 settlement is granted preliminary approval, the Court will certify a class for settlement purposes,
12 and likely appoint me as the representative of the class and my attorneys as counsel for the class.
13 I also understand that my duties will include checking in on, monitoring, and conferring with my
14 attorneys to facilitate the notice and settlement administration process, and to provide
15 information that the Court needs in order to assess whether the settlement is fair, reasonable, and
16 adequate. Further, if any individuals who are potential class members contact me, I will take
17 steps to have them referred to the Court-appointed settlement administrator so that these
18 individuals may receive the necessary information and notice they may be eligible to receive in
19 connection with the settlement and contemplated final approval hearing.

20 7. I believe that I have done everything that my attorneys have asked of me and have
21 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
22 members and the State of California with respect to aggrieved employees. I have volunteered to
23 represent and champion the interests of many other people with similar claims and injuries
24 because of the importance of the case and the necessity that all class members and aggrieved
25 employees benefit from the lawsuits equally. I understand that as a proposed class representative,
26 and if formally appointed as a class representative, I have and continue to represent the interests
27 of all members of the class in litigation to recover relief for the class. As an hourly-paid employee
28 of Defendants who was subject to the same policies, practices, and procedures as the other

members of the class, I have claims that are typical of those of the class. I consider the interests of the class just as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuits, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

8. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

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

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and 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 this ____ day of ^{07/24/2026} 2026, at Commerce, California.

Electronically Signed
2026-07-24 20:40:49 UTC - 172.56.234.110
Nintex AssureSign® a11d98f4-3e36-4e18-9f35-b4910127a88d

Mario Rodriguez