

Nicholas J. Ferraro (State Bar No. 306528)
Lauren N. Vega (State Bar No. 306525)
Elyssa Martinez (State Bar No. 355589)
Ferraro Vega Employment Lawyers, Inc.
3333 Camino del Rio South, Suite 300
San Diego, California 92108
(619) 693-7727 main / (619) 350-6855 fax
nick@ferrarovega.com / lauren@ferrarovega.com
Elyssa@ferrarovega.com

Attorneys for Plaintiff Marcelina Pereyra

[Additional Counsel on Following Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

MARCELINA PEREYRA, individually and on
behalf of all others similarly situated and the
State of California under the Private Attorneys
General Act,

Plaintiffs,

vs.

G.A.T. AIRLINE GROUND SUPPORT, INC.
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2024-00000064-CU-OE-CTL

Hon. Carolyn M. Caietti
Dept. 70

**DECLARATION OF PLAINTIFF
MARCELINA PEREYRA IN SUPPORT
OF APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING:

Date: July 25, 2025

Time: 10:30 a.m.

Dept.: 70

Complaint Filed: January 2, 2024

Trial: Not set

1 Kane Moon (SBN 249834)
2 E-mail: kmoon@moonlawgroup.com
3 Allen Feghali (SBN 301080)
4 E-mail: afeghali@moonlawgroup.com
5 Lilit Ter-Astvatsatryan (SBN 320389)
6 E-mail: lilit@moonlawgroup.com
7 Jamie C. Osganian (SBN 357626)
8 E-mail: josganian@moonlawgroup.com

9 **MOON LAW GROUP, PC**
10 725 S. Figueroa Street, Suite 3100
11 Los Angeles, California 90017
12 Telephone: (213) 232-3128
13 Facsimile: (213) 232-3125

14 *Attorneys for Plaintiff Ulualofaiga Manu, Angel Grant, and Tammy Lynn Asuncion*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1. I am a named Plaintiff in this case. I am a former employee of the named Defendant G.A.T. Airline Ground Support, Inc. (“Defendant”). As such, I have personal knowledge, or am informed and believe, of the following facts herein stated. If called as a witness, I could and would testify competently to the following:

2. I worked for Defendant as a Guest Service Agent from approximately August 2021 to July 2023. Throughout my employment, I have typically worked five days each week and in excess of eight hours each workday.

3. During my employment with Defendant, I realized that its wage and hour practices placed employees, including me, at a disadvantage. For instance, I was not compensated for all hours worked, and I was not reimbursed for all necessary business expenses incurred. Additionally, I regularly experienced problems taking full, timely, and uninterrupted meal periods and rest breaks.

4. I believe that Defendant's illegal wage and hour practices that affected me also affected all their non-exempt employees. For instance, the practice of not paying for all hours worked affected nearly all of Defendant's non-exempt employees. Additionally, I believe that other employees also experienced problems receiving reimbursement for necessary work expenses as well as their full, timely, and uninterrupted meal and rest breaks.

5. As a result of Defendant failing to compensate for all time worked and failing to provide legally compliant meal periods, and rest breaks, other employees and I were subjected to these illegal wage and hour practices.

6. I have been employed by Defendant in a non-exempt position during the putative Class Period. Accordingly, I have brought this class action case on behalf of all other employees who are also or were at some point classified as non-exempt during their employment with Defendant. I believe my alleged claims in this case impacted not only me but the entire putative Class.

1 7. I am not aware of anything special about me that would raise unique defenses to my
2 claims, as opposed to the claims of the Class. I am not suing for anything unique to me; rather, my
3 claims are based on the same facts that relate to the rest of the Class.

4 8. I believe that I have no conflicts of interest with other putative Class Members or with
5 the proposed Administrator, and I have agreed to place Class interests above my own.

6 9. I have reviewed and consented to in a signed writing the joint prosecution and fee-
7 splitting agreement between my attorneys and Moon Law Group, PC, who represents Ulualoifaiga
8 Manu, Angel Grant, and Tammy Asuncion, the other named Plaintiffs in this action.

9 DUTIES AS CLASS REPRESENTATIVE

10 10. This lawsuit is not an individual lawsuit; rather, it is a proposed class action. I understand
11 that as a Class Representative in this matter, I have an obligation to do my best to look out for the
12 interests of other Class Members. I understand that my obligations to the Class exist even when the
13 Class is certified solely as part of a class action settlement. It is my understanding that, as one part
14 of this duty to the Class, I cannot agree to a settlement to benefit myself to the exclusion of the rest
15 of the Class Members. I have never asked my attorneys to simply settle this matter at any cost; rather,
16 I have asked them to obtain the best settlement they could, within reason, and I believe they have
17 attempted to do so.

18 11. I have conferred with my attorneys about the Class and Collective Action and PAGA
19 Settlement Agreement (the “Settlement”) in this case. I am not an accountant, but I generally
20 understand the factors and risks that should be considered when evaluating a settlement. I believe the
21 Settlement is fair, adequate, and reasonable, and therefore, I would recommend the Court approve it.

22 12. I understand the obligations of being an adequate Class Representative include
23 significant responsibilities and a fiduciary duty to represent the Class, which means responding
24 truthfully, completely, and promptly to any information requests made by my attorneys; reviewing
25 facts and claims in the case to make certain the alleged Labor Code violations are redressed;
26 participating dutifully in the litigation; making myself available for any meetings, proceedings, and
27 court hearings at which I am needed; and, above all, putting Class interests above my own.

28 13. I stepped in as Class Representative in full recognition and acceptance of my

responsibilities as a Class Representative, and I continue to appreciate the importance of my responsibilities as the litigation continues.

14. I have never asked to be relieved from my role as a Class Representative. To the contrary, I have made myself available whenever my attorneys wanted to discuss aspects of my employment by defendants, and I remain committed to seeing this matter through to the end.

15. My goal in pursuing this lawsuit was to obtain a recovery on behalf of the Class, and, even more importantly, to put an end to what I believe are illegal practices on the part of Defendant.

16. Summing it all up in the simplest terms, I asked to be a stand-in for other employees of Defendant as the Class Representative. Because of that, I cannot quit on the Class, and I cannot put myself and my interests before the Class. I accept these duties and respectfully request the Court appoint me as a Class Representative.

SERVICE AS A CLASS REPRESENTATIVE

17. I believe that were it not for me and the other named Plaintiffs stepping forward and taking on the duties of protecting the interests of other Class Members in this case, it is likely that the interests of the Class would neither have been prosecuted nor benefited.

18. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I will face an increased risk that future employers will discover information about this lawsuit online and have a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

19. I have devoted a substantial amount of my time to ensure a fair result for the employee class. This involved ongoing communications and participation with my counsel during the course of this case.

20. My participation began with bringing certain issues that are involved in this matter to my attorneys' attention and explaining the factual background that was used to prosecute the claims in this case.

21. For example, I provided to my attorneys and reviewed with them documents from my employment by Defendant that I had in my possession, and I explained those documents and related facts to my attorneys to assist them in their review and analysis.

22. I also reviewed the Settlement with my attorneys to ensure that its terms are fair and adequate.

23. In sum, I believe I have provided approximately 25 hours of my time during the course of this litigation to ensure a good outcome for the best interests of the Class.

24. I have been, and will continue to be, actively involved in assisting my attorneys to support this wage and hour action.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed this Jun 18, 2025, at San Diego, California.

Marcelina Pereyra

MARCELINA PEREYRA