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8 Attorneys for Plaintiff,

9 JOSE FIGUEROA, and all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT**

12 **(UNLIMITED JURISDICTION)**

13 JOSE FIGUEROA, as an “aggrieved
14 employee” on behalf of himself and other
15 similarly situated “aggrieved employees”
16 under the Labor Code Private Attorneys
17 General Act of 2004,

18 Plaintiff,

19 vs.

20 JJ PROPERTY MAINTENANCE
21 NETWORK, INC., a California corporation;
22 and DOES 1 to 25, inclusive,

23 Defendants.

Case No.: 24STCV01057

**DECLARATION OF JOSE FIGUEROA IN
SUPPORT OF PLAINTIFF’S UNOPPOSED
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Action filed: January 16, 2024

Hearing Date: April 13, 2026

Hearing Time: 1:30 p.m.

Hearing Dept: 10, Hon. William F.
Highberger

**DECLARATION OF JOSE FIGUEROA IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT**

I, JOSE FIGUEROA, declare and state as follows:

1. I am a resident of the State of Texas and am over 18 years of age. I am the named Plaintiff in this action and am represented by Maralle Messrelian of MM Law, APC in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendant JJ PROPERTY MAINTENANCE NETWORK, INC. ("JJ" or "Defendant") as a janitor in or around February 2023. My employment with Defendant ended on or around June 14, 2023.

3. I understand that this lawsuit was initially filed as a Class Action and that the class action claims were dismissed and this is now a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that JJ is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other JJ employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as personal mobile phones for work purposes. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit.

4. I understand that the Court will decide whether to approve the Settlement if it is in the best interests of Defendant's other hourly employees and the State. I don't have any disagreements with the other JJ employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

5. I understand that my attorneys have asked the Court to pay me \$5,000.00 as a Enhancement Payment for serving as the representative plaintiff in this Action. I believe this amount is fair for the time I have spent and my involvement in this lawsuit. I also believe it is fair because of the risk that the Court could order me to pay JJ's court costs if I lose the case. I think it is fair that the Court pay me the \$5,000 award for these reasons and others I list below.

6. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. In agreeing to be their representative, I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing JJ. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

7. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at JJ was like, explaining what my employment at JJ had in common with other employees who worked for JJ, explaining my claims to my attorneys, and communicating with my attorneys about the settlement agreement and related documents. I have also carefully reviewed the Settlement agreement and other documents to make sure that the Settlement and other work my attorneys performed are in the best interests of the employees I represent and the State of California.

8. Because I filed this lawsuit, there is a public record at the Court showing my name on the cover of the complaint for anyone to see. Any potential employer who finds the lawsuit will know I sued a former employer. This could hurt my reputation. This could prevent a potential employer from choosing to hire me. An award of \$5,000.00 is not equal to the harm I would suffer if I can't find another job in the future.

9. Based on the time I have spent on the lawsuit, the risk I will have to pay JJ's court costs if I lose, and the harm to my chances of getting jobs in the future, my request for an award of \$5,000 is fair and reasonable.

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

Executed on January¹², 2026 at Houston, Texas.

Jose Figueroa (Jan 12, 2026 11:30:47 CST)
JOSE FIGUEROA, Declarant