

MARALLE MESSRELIAN (SBN 316974)

maralle@mmlawapc.com

MM LAW, APC

500 N. Brand Blvd., Ste 2000

Glendale, CA 91203

Telephone (818) 810-7747

Facsimile (818) 230-9018

Attorneys for Plaintiff,

ANDRES IBARRA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

(UNLIMITED JURISDICTION)

ANDRES IBARRA,

Plaintiff,

vs.

STADCO, a California corporation; BRETT
MATTA, an individual; and DOES 1 to 25,
inclusive,

Defendants.

Case No.: 23STCV26591

**DECLARATION OF ANDRES IBARRA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Action filed: October 30, 2023

Hearing Date: October 8, 2024

Hearing Time: 8:30 a.m.

Hearing Dept: 76, Hon. Christopher K.
Lui

Reservation Number: 528939987841

DECLARATION OF ANDRES IBARRA IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, ANDRES IBARRA, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Maralle Messrelan 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 Defendants in or around November 1998 as a welding tech at its facility located at 107 S. Avenue 20 in Los Angeles, California. I continuously worked for Defendants for the next twenty-five years. My employment with Defendants ended on or around June 15, 2023.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that STADCO and Brett Matta (collectively "STADCO") are the Defendants. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other STADCO 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 tools and 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. I don't have any disagreements with the other STADCO employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. 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. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing STADCO. 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.

5. 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,

1 speaking with my attorneys on many occasions by phone, explaining what my employment at
2 STADCO was like, explaining what my employment at STADCO had in common with other
3 employees who worked for STADCO, explaining my claims to my attorneys, participating in
4 mediation, and communicating with my attorneys about the settlement agreement and related
5 documents. Despite this, I am **not** asking for a service award for my involvement and the time I
6 spent assisting my counsel with the PAGA action.

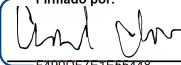
6 6. I negotiated an individual settlement of my disability and age discrimination,
7 retaliation, and wrongful termination claims after the Parties had agreed to the Settlement of the
8 PAGA action.

9 7. As part of my individual settlement, I signed a general release of all claims,
10 whether known or unknown, that I may have against Defendants, not only PAGA claims.

11 8. I don't believe that my individual settlement has any bearing on whether I have
12 served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am
13 willing to provide it to the Court *in camera* if the Court so requests.

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

16 Executed on September 13, 2024 at Los Angeles, California.

17
18 
19 Firmado por:
F490DF7E1E55448...
20 **ANDRES IBARRA,**
21 Declarant
22
23
24
25
26
27
28