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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

AILEEN RODRIGUEZ individually, and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;

Plaintiff,

vs.

ALAMITOS ENTERPRISES, LLC, a California
limited liability company; THE ALAMITOS GROUP,
an unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 30-2023-01349555-CU-OE-CXC

Honorable Layne H. Melzer
Department CX102

**DECLARATION OF AILEEN RODRIGUEZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: April 2, 2026
Time: 2:00 P.M.
Department: CX102

Complaint Filed: September 13, 2023
Trial Date: None Set

DECLARATION OF AILEEN RODRIGUEZ

I, Aileen 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 Alamitos Enterprises, LLC, erroneously sued as The Alamitos Group (“Defendants”) from approximately August 2022 to approximately March 2023 as a non-exempt, 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 their practice of not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **2 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **3 hours** discussing my situation, representative action lawsuits under the Private Attorney General Act (“PAGA”), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent over **8 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, providing information regarding the duties of aggrieved 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. As the case progressed, I was available to answer any questions my attorneys had and was 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 **5 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 Defendants.

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2 5. As far as the settlement is concerned, I was available to review documents and answer
3 any questions my attorneys had. I spent about **1 hour** reviewing the settlement agreement and about **1**
4 **hour** asking questions and discussing the potential settlement with my attorneys before signing the
5 settlement agreement.

6 6. I believe that I have done everything that my attorneys have asked of me and have tried,
7 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
8 my efforts helped to get the result obtained in this case.

9 7. For my broader individual waiver and release of claims with a California Civil Code
10 Section 1542 waiver (set forth in Section 8(b) of the Settlement Agreement), the Settlement provides
11 for a General Release Fee in the amount of \$10,000.00, to be paid out of the Total Settlement Amount,
12 subject to Court approval. I respectfully request that the Court award me full payment of the General
13 Release Fee.

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

15 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
16 compensation in this case. The only compensation I will receive is whatever amount the Court awards
17 as a general release fee, as well as my share of the settlement as an aggrieved employee.

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

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21 Executed on 12/04/2025, at Ontario, California.

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24 Electronically Signed: 2025-12-04 16:39:46 UTC - 76.32.236.179
Nintex AssureSign® 8e57c10e-efae-459f-bc2f-53a80176ed90

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Aileen Rodriguez