

Vedang J. Patel (State Bar No. 328647)
vedang@tomorrowlaw.com
Brandon M. Chang (State Bar No. 316197)
brandon@tomorrowlaw.com
BIBIYAN LAW GROUP, P.C.
1460 Westwood Blvd.
Los Angeles, California 90024
Tel: (310) 438-5555 / Fax: (310) 300-1705

Attorneys for Plaintiff, INGRID RUANO and the Class

[Additional counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

INGRID RUANO, an individual and on behalf
of others similarly situated and aggrieved
employees pursuant to the California Private
Attorneys General Act,

Plaintiff,

vs.

BOX EXPRESS, MFG., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 23STCV17209

Honorable Theresa M. Traber
Department 1

**DECLARATION OF PLAINTIFF
INGRID RUANO IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS,
ENHANCEMENT PAYMENT, AND
SETTLEMENT ADMINISTRATION COSTS;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT THEREOF**

Date: September 10, 2026
Time: 10:30 a.m.
Dept.: 1

Complaint Filed: July 21, 2023
FAC Filed: September 26, 2024
SAC Filed: April 14, 2026
Trial Date: Not Set

1 Miriam L. Schimmel (State Bar No. 185089)

mschimmel@blackstonepc.com

2 Joana Fang (State Bar No. 309623)

jfang@blackstonepc.com

3 Alexandra Rose (State Bar No. 329407)

arose@blackstonepc.com

4 Jared C. Osborne (State Bar No. 335968)

josborne@blackstonepc.com

5 Jasmine Y. Kianfard (State Bar No. 349975)

jkianfard@blackstonepc.com

6 **BLACKSTONE LAW, APC**

8383 Wilshire Boulevard, Suite 745

7 Beverly Hills, California 90211

8 Tel: (310) 622-4278 / Fax: (855) 786-6356

9 Attorneys for Plaintiff INGRID RUANO and the Class

- 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

- 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

- 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

[illegible]

9
0
1
2
3
4
5
6
7
8
9
20
21
22
23
24
25
26
27
28

28
29
30
31
32
33
34
35
36
37
38

24
25
26
27
28

1 6. I understood that in the event this matter did not settle and proceeded with trial, I would
2 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
3 responsibilities that are necessary for this lawsuit.

4 7. I know that I took a sizeable risk by pursuing this lawsuit for several reasons. First, I
5 understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also understood
6 there was a risk of losing any job and/or income due to the time that I would have to spend fulfilling
7 my responsibilities in this matter, including having to attend the trial, if needed. In contrast, the other
8 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
9 that I took in bringing this action.

10 8. I reviewed the settlement agreement, discussed the settlement agreement with my
11 attorneys, and asked them questions before signing it.

12 9. I believe that I have done everything that my attorneys have asked of me and tried, to
13 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
14 I have spent approximately 45-50 hours participating in this case as described above. I believe my
15 efforts helped get the result obtained in this case.

16 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
17 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
18 throughout the course of this litigation I have considered the interests of the Class and put them before
19 my own personal interests.

20 11. I understand that incentive or enhancement awards are discretionary and intended to
21 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
22 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
23 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
24 my work in this matter is meritorious on these points for the reasons set forth above.

25 12. I respectfully request that the Court approve and award me an Enhancement Payment
26 in the amount of \$10,000.00 for my efforts and active participation in the case and for the broader,
27 general release of all claims that I have or may have against Defendant in connection with the
28 settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount

1 is reasonable.

2 13. I understand that Blackstone Law, APC will share the attorneys' fees in this matter with
3 Bibiyan Law Group, P.C. and Sunset West Legal Group, PC. I agreed to this in writing. I understand
4 that the amount of attorneys' fees will not increase as a result of this fee sharing.

5 14. I am not related to anyone associated with Blackstone Law, APC, Bibiyan Law Group,
6 P.C., or Sunset West Legal Group, PC.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct. Executed on 12/11/2025, at La Puente, California.

9
10 *Ingrid Ruano*

11 _____
Ingrid Ruano
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28