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Superior Court of California,
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David W. Slayton,
Executive Officer/Clerk of Court,
By K. Valenzuela, Deputy Clerk

Attorneys for Plaintiffs ROSEMARY IGLESIAS, EVET RICO, and MARIA RICO, and all
others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ROSEMARY IGLESIAS, an individual;
EVET RICO, an individual; MARIA RICO, an
individual; on behalf of themselves and all
others similarly situated and the general
public,

Plaintiffs,

vs.

LAUNDRY PLANET, LLC, a California
limited liability company; SANTA FE
LAVANDERIA, LLC, a California limited
liability company; YOUR LAUNDRY
BUTLERS, LLC, a California limited liability
company; ART JAEGER, an individual; and
DOES 1 to 100, inclusive,

Defendants.

Case No. 23STCV28632

[Assigned for All Purposes to:
The Hon. William F. Highberger, Dept. SS10]

**DECLARATION OF PLAINTIFF AND
CLASS REPRESENTATIVE ROSEMARY
IGLESIAS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: March 18, 2025

Time: 10:30 a.m.

Dept: 10

1 I, ROSEMARY IGLESIAS, declare as follows:

2 1. I am over the age of eighteen and am a Class Representative Plaintiff in the matter
3 *Iglesias v. Laundry Planet LLC, et al.* The foregoing is based upon my personal knowledge and,
4 if called as a witness, I could and would competently testify thereto.

5 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
6 of Class Action Settlement.

7 3. I was previously employed by Defendants from 2021 to 2023 and worked in
8 California as a laundry attendant. During my time working for Defendants, I was subjected to
9 the same wage and hour policies and practices that are at issue in this case, including the
10 Defendants' practice of failing to pay employees all wages owed, failing to provide meal periods,
11 failing to authorize and permit rest periods, failing to provide accurate wage statements, and
12 related issues.

13 4. Since the beginning of this case, I have been closely involved in assisting my
14 attorneys with prosecuting this action and have done so diligently and aggressively since I filed
15 the Complaint in November 2023. Prior to getting involved in this case, I spoke with my
16 attorneys for many hours to understand the nature of the case and shared with my attorneys the
17 wage and hour violations that I experienced at Defendants. Before becoming involved in the
18 case, I also spent several hours acquainting myself with my duties and obligations as a class
19 action representative, and my role in prosecuting this case against Defendants.

20 5. After I became involved in this case, I assisted my attorneys in reviewing and
21 understanding the documents exchanged in discovery. I reviewed many of Defendants' payroll
22 records and policy documents with my attorneys and answered my attorneys' questions relating
23 to those documents.

24 6. As the parties were negotiating settlement of this case, I stayed in communication
25 with my attorneys throughout this time period and worked with my attorneys in answering any
26 questions they had to help them to achieve the best results possible to resolve this matter through
27 settlement. I made sure to always make myself available to answer any questions they had and
28 respond to case issues that came up throughout the settlement negotiation process.

1 7. Since the parties reached agreement on settlement, I have communicated with my
2 attorneys regarding the settlement terms, and spent many hours reviewing the lengthy settlement
3 agreement, and ensuring that the settlement agreement is fair to all class members.

4 8. As detailed above, I actively participated in all stages of litigation and have been
5 continuously apprised of all aspects of this case.

6 9. I have been diligent, and I believe I acted above and beyond that which was
7 expected of me as a Class Representative throughout all stages of the litigation, up to and
8 including the settlement of this Class Action. I understand and agree to my fiduciary obligations
9 and responsibilities as a class representative, and I have agreed to act in the best interests of the
10 class in pursuing the claims alleged in this case. I also have no claims that are antagonistic to the
11 class, as my interests are aligned with all other class members to obtain the best possible
12 resolution for the class.

13 10. I believe that the Class Action Settlement and PAGA representative settlement in
14 the gross amount of \$140,000 obtained on behalf of the class is excellent in view of the complex
15 and varied issues involved with the case. I took into consideration the strength and weakness of
16 the various claims for all employees and along with my attorneys agreed to the settlement. I was
17 prepared to sit for trial, if necessary. I strongly support the settlement in this matter. When I was
18 contemplating settlement, I always kept the best interests of the class and the aggrieved
19 employees in mind over my own and I was not willing to settle the matter until I felt it was in the
20 best interests of all class members and aggrieved employees.

21 11. In addition to performing work on this matter, I assumed a substantial risk in
22 serving as a class representative if the Defendants prevailed in this case. My willingness to
23 assume the financial risk was and is significant. Although I was confident in the merits of this
24 lawsuit, I do not have any savings to speak of, and bringing this lawsuit was a serious
25 commitment on my behalf and exposed myself to considerable risk. My attorneys have advised
26 me that California law provides that the losing party must pay the prevailing party's costs. As
27 such, if the Defendants had prevailed in this case, I would have been subjected to a cost award in
28

the amount of tens of thousands of dollars. Notwithstanding these risks, I chose to serve in my capacity as Class Representative and pursue all claims against Defendants.

12. I also believe I was wrongfully terminated from Defendants after I complained about certain wage issues. I specifically complained about not receiving breaks as required under California law, and soon after I complained, I was terminated. I gave up my termination claim to participate in this class action lawsuit, and I believe my termination claim could have been more lucrative than acting as a class representative. Notwithstanding that, I am releasing all claims against Defendants, and decided to represent the interests of other employees affected by Defendants' wage practices.

13. Given the above, I believe a \$5,000 enhancement fee and general release payment is appropriate, and fair and reasonable in this case.

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

Executed on February 19, 2025, in the City of Los Angeles, State of California.

DocuSigned by:

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 Rosemary Iglesias