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

MARIA L. YANEZ ZEPEDA, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

TMI AUTOMOTIVE PRODUCTS INC.; TMI
PRODUCTS, INC; IPC IMPORT PARTS
CONNECTION INC.; and DOES 1 through 50,
inclusive,

Defendants.

Case No. CVRI2305081

[Assigned for all purposes to: Hon. Harold W.
Hopp, Dept. 1]

**SUPPLEMENTAL DECLARATION OF
MARIA L. YANEZ ZEPEDA IN SUPPORT
OF PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

1 **SUPPLEMENTAL DECLARATION OF MARIA L. YANEZ ZEPEDA**

2 I, Maria L. Yanez Zepeda, hereby declare as follows:

3 1. I have personal knowledge of the facts in this declaration and if called to testify, I could
4 and would do so under oath. I make this declaration in support of my Motion for Final Approval of
5 the Class Action and PAGA Settlement.

6 2. I am a former employee of Defendants TMI AUTOMOTIVE PRODUCTS INC.; TMI
7 PRODUCTS, INC; IPC IMPORT PARTS CONNECTION INC. (“Defendants”). I was employed by
8 Defendants beginning on approximately January 22, 2020 to June 13, 2023.

9 3. Through my attorneys, I take on the responsibilities of the class representative in the
10 lawsuit against Defendants. I decided to join the lawsuit as the class representative because I believe
11 that Defendants did not pay me and other employees all our wages, did not provide us with proper
12 meal and rest breaks, did not provide us with accurate wage statements, did not provide us all our
13 wages when our employment ended, and did not reimburse us for our out-of-pocket work expenses.

14 4. I was very familiar with Defendants’ employment policies and practices based on my
15 work experience. I believe that my knowledge and experience helped my attorneys reach a settlement
16 in this case.

17 **Work Performed in the Case**

18 5. I spent at least 45 hours performing my duties as a plaintiff in this class action case,
19 and I remain committed to performing the duties of a class representative.

20 6. Throughout the case, I participated in many conversations with my attorneys to be as
21 informed as I could be about what class action cases are, how class actions affect class members, the
22 steps and risks involved in litigating class actions, the strengths and weaknesses of the claims, what
23 would be required of me as a class representative, and the status of the case.

24 7. I spent time going over documents with my attorneys, described Defendants’ policies
25 and practices, and answered questions about my work experience.

26 8. I reviewed the terms of the settlement with my attorneys to understand the terms and
27 the process for settling class action cases.

28 9. Even while the settlement agreement was being negotiated, I communicated with my

1 attorneys for updates on the case. I wanted to know when the next hearings were so I could try to be
2 available if my attorneys needed my help.

3 Risks and Responsibilities of Becoming the Named Plaintiff

4 10. When I decided to become involved in this lawsuit as a potential class representative,
5 I understood that I was seeking compensation for not only myself, but also for all other class members
6 who worked for Defendants. By doing so, I understood that I would be delaying my own recovery for
7 the benefit of other class members.

8 11. By pursuing the case as a class action, I waited over a year to be able to request that I
9 be appointed the class representative and will have to wait longer to receive any monetary award in
10 this case due to the additional steps for settling a class action lawsuit.

11 12. I was aware that by filing this lawsuit, other employees would learn that I filed a lawsuit
12 against my former employers. The notice of the settlement will be sent to hundreds of class members.

13 13. As a named plaintiff, I was also aware that there were risks involved and that the case
14 could continue for several years, requiring my attention, services, and time throughout the entire case.
15 Even if we won at trial, I learned that there could be more delays by appeals. Even though I felt strongly
16 about the claims, I was aware I could have been responsible for some or all of Defendants' legal costs
17 if the case was not successfully concluded.

18 14. Even with the risks, I was willing to act on behalf of other employees, but I was
19 concerned about how long it could take for the case to be resolved, about losing the case, having a
20 judgment filed against me for costs, or losing job opportunities in the future.

21 Enhancement Award

22 15. Even with the risks, I performed the necessary duties to help prosecute the case against
23 the Defendants. I offered to help my attorneys and the class members throughout the case and tried to
24 represent the class to the best of my ability. I decided to be the class representative to minimize the
25 risk that no other class member would have undertaken these responsibilities, especially for those who
26 might have been afraid of being involved in these kinds of lawsuits.

27 16. I understand that I may be entitled to an additional payment for my role as a class
28 representative and my work related to this case. I understand that this additional payment is not

1 guaranteed and needs the Court's approval. Taking into consideration the time I dedicated to this case
2 and the results achieved on behalf of other class members, I believe that the requested enhancement
3 award is reasonable. My opinion about the fairness of the settlement in this case is not based on this
4 potential payment.

5 17. I do not have any involvement or interests in the settlement administrator, Apex Class
6 Action, LLC. I do not have any conflict or interests associated with the California State Controller's
7 Office. I am not aware of any interests I have that are adverse to the interests of the class, and I do not
8 have any conflicts that would keep me from representing other class members.

9 18. I have been advised in writing that my attorneys, Torus LLP, have agreed to a division
10 of attorneys' fees with Wilshire Law Firm and Blackstone Law, APC. I hereby consent to the division
11 of attorneys' fees among Plaintiffs' counsel and their respective law firms.

12 19. I believe that I demonstrated my dedication to helping reach the settlement and helping
13 my attorneys throughout the case for the benefit of the class members. If appointed as the class
14 representative, I will continue to dedicate my time and effort to assisting my attorneys and representing
15 the class members' interests until this case is resolved.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing
17 is true and correct.
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Maria L. Yanez Zepeda (Aug 17, 2026 09:11:06 PDT)
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