

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
Maria Halwadjian (SBN 358015)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Geovanni Vazquez

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

GEOVANNI VAZQUEZ, individually, and
on behalf of other members of the general
public similarly situated,

Plaintiffs,

v.

CALCARE, INC., a California corporation;
CARPINTERICA LLC, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: S-CV-0049068

Honorable Michael Jones
Department 3

CLASS ACTION

**DECLARATION OF GEOVANNI
VAZQUEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Hearing Date: September 11, 2025
Hearing Time: 8:30 a.m.
Department: 3

Complaint Filed: September 7, 2022
Trial Date: None Set

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF GEOVANNI VAZQUEZ

I, **Geovanni Vazquez**, 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 action *Vazquez v. Calcare, Inc., et al.*, Superior Court of California for the County of Placer, Case No. S-CV-0049068. 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 Calcare, Inc. (“Defendant Calcare”) and Carpinterica LLC (“Defendant Carpinterica”) (together, “Defendants”) as an hourly-paid Janitor/Housekeeper from approximately January 2019 to approximately September 2019. 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, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the pendency of the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering their questions, providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I frequently checked in with my attorneys and their staff to make sure that they had all my most current information

1 and any additional information that I had obtained.

2 4. As the case progressed, I was available to answer any questions my attorneys had
3 and remained available to speak and meet with my attorneys whenever they needed me. I
4 responded to them as quickly as possible and gave them as much information and identified as
5 many documents as I could. I spent time speaking with my attorneys about the case, identifying
6 potential witnesses, providing my attorneys with documents and information concerning the
7 case, and also describing policies, practices, and procedures of Defendants. During the discovery
8 phase of litigation, I assisted my attorneys in preparing responses to Defendant Calcare's
9 discovery requests and producing responsive documents.

10 5. As far as the settlement is concerned, I was available to review documents and
11 answer any questions my attorneys had. I reviewed the settlement agreement, asked questions,
12 and discussed the potential settlement with my attorneys before signing the settlement
13 agreement.

14 6. I believe that I have done everything that my attorneys have asked of me and have
15 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
16 obtained in this case, and as a class representative and PAGA representative, I respectfully
17 request that the Court award me an enhancement award in the amount of \$10,000.00 for my
18 active participation in this case. Taking into consideration the time that I have dedicated to this
19 case, I believe that this amount is reasonable.

20 7. I am not related to anyone associated with Lawyers *for* Justice, PC or
21 GrahamHollis APC.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

DECLARATION OF GEOVANNI VAZQUEZ

1 ///

2 8. I have not entered into any undisclosed agreements, nor have I received any
3 undisclosed compensation in this case. The only compensation I will receive is whatever amount
4 the Court awards as an enhancement award, as well as my share of the settlement as a class
5 member and aggrieved employee.

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

08/15/2025

8 Executed this _____ day of August 2025, at East Palo Alto, California.

9 
10 Electronically Signed: 2025-08-16 05:30:30 UTC - 71.198.241.229
Nintex AssureSign® 79db5a8b-e8ce-400e-bb7c-b33a01568d10

11 Giovanni Vazquez
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF GEOVANNI VAZQUEZ