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Attorneys for Plaintiff JAVARIO DATRAIL LUNA,
individually, and on behalf of Aggrieved Employees
pursuant to the California Private Attorneys General Act

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

JAVARIO DATRAIL LUNA, individually,
and on behalf of Aggrieved Employees
pursuant to the California Private Attorneys
General Act,

Plaintiffs,

vs.

A-CHECK AMERICA, INC., a Delaware
corporation; STERLING INFOSYSTEMS,
INC., a Delaware corporation.; and DOES 1
through 25, inclusive,

Defendants.

Case No. CVRI2306180

Honorable Daniel Ottolia
Department 4

**DECLARATION OF JAVARIO DATRAIL
LUNA IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND AWARD OF PAGA
COUNSEL FEES PAYMENT, PAGA
COUNSEL LITIGATION EXPENSES
PAYMENT, REPRESENTATIVE
PAYMENT, AND ADMINISTRATION
EXPENSES PAYMENT**

Reservation No. 483523503973
Date: November 5, 2025
Time: 8:30 a.m.
Department: 4

Complaint Filed: November 14, 2023
Trial Date: None Set

DECLARATION OF JAVARIO DATRAIL LUNA

I, Javario Datrail Luna, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am the named plaintiff in the above-entitled action. 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 Defendants A-Check America, Inc. and Sterling Infosystems, Inc. (together, "Defendant") as an hourly-paid, non-exempt Records Specialist from approximately January 2003 to July 2023.

3. During my employment, I questioned whether Defendant was paying its employees correctly and I believed that I, along with other employees, were not being allowed to take meal and rest breaks lawfully, among other things. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, not providing employees with lawful meal and rest breaks, and other related violations.

4. As a result, I decided to seek legal advice about my experience working for Defendant and to obtain information about filing a lawsuit to redress these grievances. I contacted Blackstone Law, APC and spoke with their attorneys. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, representative action lawsuits under the Private Attorneys General Act ("PAGA"), and what it meant to bring a PAGA action so that I understood what I was considering doing.

5. I have regularly communicated with my attorneys regarding the case and in order to fulfill my responsibilities as a PAGA representative. I have searched for and provided documents concerning my employment with Defendant, reviewed documents with my attorneys and answered their questions, provided information and guidance regarding the duties of other hourly-paid and/or non-exempt employees, and helped determine what other documents and information they could obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my current information so that they could always reach me, and to provide any additional information that I had obtained.

1 6. I was always available to answer any questions my attorneys had and to speak and meet
2 with my attorneys whenever they needed me. I responded to them as quickly as possible and gave
3 them as much information as I could.

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

7 8. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
8 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
9 also understood there was a risk of losing any current job and/or income due to the time that I would
10 have to miss work in order to fulfill my duties and responsibilities in this matter, including having to
11 attend the trial, if needed. Most importantly, I believe that by pursuing this case, I have taken a
12 significant risk because future employers can easily find out that I sued my prior employer, and that
13 may negatively impact my ability to find employment within this industry – and even outside of it –
14 in the future. In contrast, the other employees who will be receiving money from this lawsuit did not
15 have to file a claim or take the risk that I took in bringing this action.

16 9. I reviewed the settlement agreement in this case and discussed it with my attorneys
17 before I signed it.

18 10. I believe that I have done everything that my attorneys have asked of me and tried, to
19 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I have
20 spent approximately 30-35 hours participating in this case as described above. I think my efforts
21 helped to get the result obtained in this case.

22 11. I understand that any resolution of this lawsuit on a representative basis is subject to
23 court approval. At all times throughout the course of this litigation I have considered the interests of
24 the Aggrieved Employees above my own personal interests.

25 12. I respectfully request that the Court approve and award me a Representative Payment
26 in the amount of \$5,000.00 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 am not related to anyone associated with Blackstone Law, APC.

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

5 Executed on 06/04/2025 at San Bernardino, California

6 *Javario Luna*
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8 Javario Datrail Luna
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