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Attorneys for Plaintiff

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

,MAURICIO ANTHONY FONSECA,
individually, and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

ARM MANAGEMENT, INC., a California
limited liability company; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 23STCV27739

Honorable Barbara A. Meiers
Department 12

**DECLARATION OF MAURICIO ANTHONY
FONSECA IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL. LABOR
CODE § 2698, ET SEQ.) SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS, GENERAL
RELEASE FEE, AND SETTLEMENT
ADMINISTRATION COSTS**

Reservation ID: Specially Set by Court
Date: April 11, 2025
Time: 9:00 a.m.
Department: 12

Complaint Filed: November 13, 2023
Trial Date: None Set

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1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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.

3. I have spent many hours communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

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1 5. As far as the settlement is concerned, I was available to review documents and answer
2 any questions my attorneys had. I spent several hours reviewing the settlement agreement and asking
3 questions and discussing the potential settlement with my attorneys before signing the settlement
4 agreement.

5 6. I believe that I have done everything that my attorneys have asked of me and have tried,
6 to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think
7 my efforts helped to get the result obtained in this case.

8 7. For my broader individual waiver and release of claims with a California Civil Code
9 Section 1542 waiver (set forth in Section 8(b) of the Settlement Agreement), the Settlement provides
10 for a General Release Fee in the amount of \$10,000.00, to be paid out of the Total Settlement Amount,
11 subject to Court approval. I respectfully request that the Court award me full payment of the General
12 Release Fee.

13 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

14 9. I have not entered into any undisclosed agreements, nor have I received any undisclosed
15 compensation in this case. The only compensation I will receive is whatever amount the Court awards
16 as a general release fee, as well as my share of the settlement as an aggrieved employee.

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

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20 Executed this⁰² day of April 2025, at Los Angeles, California.

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22 The image shows an electronic signature box. Inside the box, there is a handwritten signature in black ink. Above the signature, the text "Electronically Signed" is visible on the left and "2025-04-02 18:55:44 UTC - 76.81.18.66" is visible on the right. Below the signature, the text "Nitex AssureSign®" is visible on the left and "6709514d-4bc1-488f-b77f-b2b0137ad22" is visible on the right.

23 Mauricio Anthony Fonseca
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