

Jonathan M. Genish (State Bar No. 259031)
jgenish@blackstonepc.com
Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff ALEJANDRA JIMENEZ,
individually, and on behalf of Aggrieved
Employees pursuant to the California
Private Attorneys General Act

[Additional Counsel on Next Page]

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

DARREN GARCIA, an individual on behalf
of himself and all others similarly situated,

Plaintiff,

vs.

CLEARFREIGHT, INC., a California
Corporation; and DOES 1 through 50, inclusive,

Defendants.

ALEJANDRA JIMENEZ, individually, and
on behalf of Aggrieved Employees pursuant to
the California Private Attorneys General Act

Plaintiffs,

vs.

CLEARFREIGHT INC., a California
corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. 23STCV22946 (Lead)
(Consolidated with Case No. 23STCV28938)

Assigned for all purposes to Hon. Carolyn B.
Kuhl, Dept. 12

**DECLARATION OF ALEJANDRA
JIMENEZ IN SUPPORT OF PLAINTIFFS’
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND AWARD OF PAGA
COUNSEL FEES PAYMENT, PAGA
COUNSEL LITIGATION EXPENSES
PAYMENT, ENHANCEMENT PAYMENT,
AND ADMINISTRATION EXPENSES
PAYMENT**

Date: November 20, 2024
Time: 10:30 a.m.
Department: 12

Garcia Complaint Filed: September 21, 2023
Garcia FAC Filed: November 27, 2023
Jimenez Complaint Filed: November 28, 2023
Garcia SAC Filed: August 2, 2024

1 D.LAW, INC.
Emil Davtyan (SBN 299363)
2 Emil@d.law
David Yeremian (SBN 226337)
3 d.yeremian@d.law
Natalie Haritounian (SBN 324318)
4 n.haritounian@d.law
880 E Broadway
5 Glendale, CA 91205
Telephone: (818) 962-6465
6 Fax: (818) 962-6469

7 Attorneys for Plaintiffs DARREN GARCIA and
TAYLOR EDWARD LEBOWE, on behalf of
8 themselves and others similarly situated

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF ALEJANDRA JIMENEZ

I, Alejandra Jimenez, 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 action entitled *Alejandra Jimenez v. ClearFreight Inc.*, Los Angeles County Superior Court Case No. 23STCV28938. 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 Defendant ClearFreight, Inc. ("Defendant") as an hourly-paid, non-exempt Import Traffic Coordinator from approximately October 2021 to March 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, not reimbursing employees for business expenses, 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. In that regard, I contacted Blackstone Law, APC and spoke with their attorneys to gain a better understanding of what it meant to bring a lawsuit under the California Labor Code Private Attorneys General Act of 2004 ("PAGA"). After speaking with them, I decided to retain Blackstone Law, APC to proceed with my individual claims and the representative action pursuant to PAGA.

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 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.

6. I was always available to answer any questions my attorneys had and to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I described Defendant's policies, practices, and procedures and helped my attorneys prepare for and participate in mediation.

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

8. I reviewed the settlement agreement in this matter and discussed it with my attorneys before I signed it. I have also executed a separate agreement to settle and resolve my individual claims with Defendant.

9. It is my understanding that Blackstone Law, APC has entered into a written fee splitting agreement with attorneys at D.Law, Inc.. I have been properly informed and have consented to and approved the aforementioned fee-splitting agreement in writing.

10. I am not related to anyone associated with Blackstone Law, APC or D.Law, Inc..

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

Executed on 07/17/2024 at Inglewood, California



Alejandra Jimenez