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Counsel for Plaintiff

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

NATALI GODINEZ ZUNIGA, individually, and
on behalf of other aggrieved employees pursuant
to the California Private Attorneys General Act,

Plaintiff,

vs.

CROWN DODGE, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 2023CUOE017631

Honorable Charmaine H. Buehner
Department 44

**DECLARATION OF NATALI GODINEZ
ZUNIGA IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL. LABOR
CODE § 2698, *ET SEQ.*) SETTLEMENT
AGREEMENT**

Date: July 1, 2026
Time: 1:30 P.M.
Department: 44

Complaint Filed: December 11, 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 over 16 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 hourly-paid and non-exempt 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.

5. As far as the settlement is concerned, I was available to review documents and answer any

1 questions my attorneys had. I spent substantial time reviewing the settlement agreement and asking
2 questions and discussing the potential settlement with my attorneys before signing the settlement
3 agreement.

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

7 7. For my broader individual waiver and release of claims with a California Civil Code
8 Section 1542 waiver (set forth in Section 8(b) of the Settlement Agreement), the Settlement provides for
9 a General Release Fee in the amount of \$7,500.00, to be paid out of the Total Settlement Amount, subject
10 to Court approval. I respectfully request that the Court award me full payment of the General Release
11 Fee.

12 8. I am not related to anyone associated with Sweeny Law, PC or Lawyers *for* Justice, PC.

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

16 10. My attorneys have agreed to split fees awarded by the Court or generated as a result of
17 this case, and I have given written consent to that split.

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

20 Executed this 4th day of June 2026, at Oxnard, California.

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Natali Godinez Zuniga (Jun 4, 2026 13:56:50 PDT)

23 Natali Godinez Zuniga
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