

John G. Yslas (SBN 187324)  
john.yslas@wilshirelawfirm.com  
Eugene Zinovyev (SBN 267245)  
eugene.zinovyev@wilshirelawfirm.com  
John Brown (SBN 233605)  
john.brown@wilshirelawfirm.com  
Gabriella Solé (SBN 346164)  
gabriella.sole@wilshirelawfirm.com  
Lucy H. Nguyen (SBN 338783)  
lucy.nguyen@wilshirelawfirm.com  
**WILSHIRE LAW FIRM, PLC**  
660 S. Figueroa Street, Sky Lobby  
Los Angeles, CA 90017  
Telephone: (213) 381-9988  
Facsimile: (213) 381-9989

Attorneys for Plaintiff

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

SANDRA YAQUINTO, an individual, on behalf  
of herself and others similarly situated,

Plaintiff,

v.

UNICO ENGINEERING INC., a California  
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23CV009174

Consolidated with Case No.: 24CV013737

*Assigned for All Purposes to:*  
*Hon. Lauri A. Damrell*  
*Dept. 8B*

**DECLARATION OF SANDRA  
YAQUINTO IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION AND  
PAGA SETTLEMENT**

Final Approval Hearing:

Date: September 18, 2026

Time: 9:00 a.m.

Dept.: 8B

**DECLARATION OF SANDRA YAQUINTO**

I, Sandra Yaquinto, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action and PAGA Settlement.

**Risks, Both Financial and Otherwise, Faced in Bringing the Suit**

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant Unico Engineering Inc. ("Defendant") and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendants, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner's office.

3. I was also made aware that being a class representative and private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney general, I might be responsible for some or all of Defendants' legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

**Notoriety and Personal Difficulties Encountered**

5. As the named plaintiff, I am the face of the litigation. Additionally, the class notice that was mailed in this case was sent to over 161 current and former employees of Defendants. The notice informed all these employees that I filed a class and representative

1 action against Defendants. Exposing myself to this kind of publicity creates a risk for my future  
2 career prospects, since current and former employees of Defendants may move to different  
3 companies within the construction management, land surveying, and systems integration  
4 services industry or may know people at other companies within the construction management,  
5 land surveying, and systems integration services industry who may not want to hire someone  
6 who sued her employer.

7 **Amount of Time and Effort Spent and Duration of the Litigation**

8 6. I have spent a substantial amount of time and effort on this litigation. My work  
9 on this case has included, among other things, searching for, gathering, and providing  
10 documents and information to my attorneys; discussing potential witnesses and my experiences  
11 working for Defendant; keeping in regular contact with my attorneys regarding the status of the  
12 case; assisting with written discovery, including reviewing and providing responses and  
13 supplemental responses to discovery served by Defendant; producing documents in advance of  
14 my deposition; preparing with my attorneys for my deposition and having my deposition taken;  
15 assisting my attorneys in preparing for mediation; being on-call for my attorneys on the day of  
16 mediation in case questions or concerns arose; and participating in settlement discussions. After  
17 mediation, I remained actively involved by reviewing the settlement papers and contacting my  
18 counsel for updates. Since retaining my counsel in August 2023, I estimate that I have spent  
19 approximately 55 hours on these activities, and I expect to spend additional time assisting my  
20 attorneys through final approval and the distribution of settlement payments.

21 **Personal Benefit Received as a Result of the Litigation**

22 7. Absent the requested service payment, the personal benefit I will receive is the  
23 same as all other employees. But unlike the other employees, I have signed a general release for  
24 Defendants. Unlike the other Participating Class Members, I have agreed to a broader release  
25 of claims against Defendant, including a waiver of rights under California Civil Code section  
26 1542.

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

3 Executed on 8/19/2026, at Rocklin, California.

4 Signed by:

*Sandra Yaquinto*

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Sandra Yaquinto