

1 **BLUMENTHAL NORDREHAUG BHOWMIK**  
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 2255 Calle Clara

7 La Jolla, CA 92037

8 Telephone: (858)551-1223

9 Facsimile: (858) 551-1232

10 Website: [www.bamlawca.com](http://www.bamlawca.com)

11 Attorneys for Plaintiffs

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF LOS ANGELES**

14 ZION ESTRADA, an individual, on behalf of  
15 herself and on behalf of all persons similarly  
16 situated,

17 Plaintiff,

18 vs.

19 WILLIAMS LEA LLC, a Limited Liability  
20 Company; and DOES 1 through 50, inclusive,

21 Defendants.

**CASE NO.: 23STCV29851**

**DECLARATION OF ZION ESTRADA IN  
SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENT**

Hearing Date:

Hearing Time:

Judge: Hon. Samantha Jessner

Dept: 7

Date Filed: December 7, 2023

Trial Date: Not set

22  
23  
24  
25  
26  
27  
28 **DECLARATION OF ZION ESTRADA IN SUPPORT OF MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT**

1 I, Zion Estrada, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the  
3 above-entitled matter. I submit this declaration in support of the Motion for Preliminary Approval  
4 of Class Settlement and in support of my application for a Class Representative Service Payment.

5 2. I have personal knowledge of all the facts stated herein. I could and would competently  
6 testify under oath to these facts in court if requested to do so.

7 3. During the class period I have worked as an Office Services Associate for the Defendant  
8 Williams Lea LLC (“Williams Lea”) (“Defendant”) in California and during that time period I  
9 was classified by Defendant as a non-exempt employee.

10 4. I retained my attorneys who are experienced in both class action and PAGA representative  
11 action litigation and claims against employers for violations of the California Labor Code. I have  
12 no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware  
13 of having any actual or potential conflicts of interest with another class member in this case. I am  
14 not aware of any other pending matter or action asserting claims that will be extinguished or  
15 adversely affected by this settlement.

16 5. I decided to pursue this class action lawsuit and be a plaintiff/class representative  
17 because I felt that my legal rights as an employee and others like me were violated. I often did not  
18 receive compliant meal periods which were late, interrupted or missed entirely. I did not have the  
19 opportunity to take rest breaks at all. Also, I was required to work off the clock and to use my  
20 personal cell phone for work related purposes without reimbursement.

21 6. I spoke to my attorneys several times and discussed how Defendants implemented their  
22 company policies and procedures. I also assisted my attorneys in their investigation into my claims  
23 by providing them documents and answering their questions. I reviewed the complaint before it  
24 was filed and, after it was filed, I was given access to an electronic file sharing program that  
25 alerted me via email when important documents were filed so that I could review them and keep  
26 up with the developments in the case which I understood was one of my duties as a class  
27 representative. I would also contact my attorneys from time to time if I had any questions about

28  
DECLARATION OF ZION ESTRADA IN SUPPORT OF MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT

---

1 the case.

2 7. Even though this action is in the process of settling, I was and remain prepared to perform  
3 all the duties of a class representative. I understand that as a class representative I have assumed a  
4 fiduciary responsibility to prosecute this class action on behalf of the absent class members. I  
5 have understood that as a fiduciary, I have a duty to prosecute this action for the benefit of the  
6 class members and surrender any right to compromise the group action for an individual gain.

7 8. I understood that being a plaintiff/class representative in this case meant that I was seeking  
8 damages not only for myself but also other current and/or former non-exempt employees working  
9 for Defendant in California who make up the class. I felt that these individuals were not aware of  
10 their labor law rights and even if they were they would probably be apprehensive about speaking  
11 up or even simply because of the time, effort and risk involved in filing a class action lawsuit.

12 9. I understood that being a part of this lawsuit involved risks. For example, my attorneys  
13 explained to me that if the case went to trial and we lost, I could be held responsible to pay for all  
14 or part of the attorney fees and costs paid by Defendant to defend this lawsuit. Also, I knew there  
15 was a risk that future employers, if they ever find out about this lawsuit, could hold it against me  
16 or downgrade me as a potential hire. As the named Plaintiff in this case, it would not be difficult  
17 for a future employer to become aware that I sued my employer for labor law violations.  
18 Ultimately I decided these risks were worth it and decided to fight for my rights and the rights of  
19 others regardless of the risks, time and effort I spent on this case.

20 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also kept up  
21 to date on important developments by reviewing court filings that were made available to me  
22 electronically as I described above.

23 11. A mediation took place on May 21, 2025 with Tagore Subramaniam, Esq., a well-  
24 respected and experienced mediator of wage and hour class actions. After the mediation the parties  
25 were able to come to an agreement to settle the action based on a mediator's proposal. I  
26 communicated with my attorneys regarding the terms of the settlement which was reached  
27 between the parties and understood that I was representing absent class members and therefore

28  

---

DECLARATION OF ZION ESTRADA IN SUPPORT OF MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT

1 wanted the best possible result to be obtained for the class members and I believe a very positive  
2 result was in fact achieved via settlement. I reviewed and signed the Memorandum of  
3 Understanding on June 13, 2025.

4 12. I have been actively involved with this lawsuit performing the duties described above.  
5 Although I did not keep time records, I was in regular contact with my attorneys, reviewed court  
6 filings, and spent a significant amount of time on the issues presented during the lawsuit and in the  
7 settlement process. I estimate that I spent approximately 20-30 hours working on this case up  
8 until this point. I believe I have been diligent and have done what is expected of a named plaintiff  
9 and a proposed class representative to date, and will continue to do so. I have and always will  
10 maintain the best interest of the class members.

11 13. My attorneys explained to me that the settlement process involves a two-step review by the  
12 Court to determine whether the settlement is fair before approving the settlement. I know this  
13 process also involves notifying all class members of the settlement terms and of their rights to  
14 make a claim for their settlement share, to opt out of the settlement or to object to the settlement.

15 14. I believe I did the right thing by filing this case on behalf of the class members who,  
16 subject to court approval, are in line to receive monetary payments as a result of this case and  
17 settlement. This is money they may never have ever gotten if I did not pursue this action on their  
18 behalf. I feel significant personal satisfaction to know that I played a role in the class members  
19 being entitled to monetary payments as a result of the filing of this lawsuit. I also believe that the  
20 requested Class Representative Service Payment of \$15,000 from the settlement is fair  
21 compensation for the work I performed and the risks I undertook.

22 15. As part of the settlement it was necessary for me to sign a general release of all claims I  
23 may have against Defendants. I believe the Class Representative Service Payment I have requested  
24 provides me with some compensation for this agreed release.

25 16. In light of all the time and effort I have spent on this case, the risk I undertook by suing my  
26 employer, the exposure to being responsible for paying Defendant's costs in the event we did not  
27 win the case, the reputational risk that future employers may hold this lawsuit against me, the

28  
DECLARATION OF ZION ESTRADA IN SUPPORT OF MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT

---

1 general release and in light of the size of the settlement, I believe the request for \$15,000 as a  
2 Class Representative service payment is fair and reasonable.

3 ///

4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

---

DECLARATION OF ZION ESTRADA IN SUPPORT OF MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT

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

3  
4 Executed on 09/25/2025, at Astoria, NY.  
5 (city, state)

6   
7 Zion Estrada (Sep 25, 2025 19:35:51 EDT)  
8 Zion Estrada  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

28 DECLARATION OF ZION ESTRADA IN SUPPORT OF MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT