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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES**

18 MONET L. STERLING, on behalf of herself  
and current and former aggrieved employees

19 Plaintiff,

20 vs.

21 DOTHAN SECURITY, INC.; and DOES 1  
22 to 100, inclusive,

23 Defendants.

Case No.: 23STCV08293

Assigned for All Purposes to:  
Hon. Bruce G. Iwasaki  
Dept. 58

**DECLARATION OF ANDREW TARIGAN IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
APPROVAL OF PAGA SETTLEMENT**

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TARIGAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
APPROVAL OF PAGA  
SETTLEMENT**

Case No. 23STCV08293

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13 on behalf of the State of California, and others similarly situated and aggrieved

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1. I am an adult over the age of eighteen (18) years old. I am one of the named Plaintiff in the above-captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this declaration in support of Plaintiffs' Motion for Approval of Private Attorneys General Act ("PAGA") Settlement.

3. I understand that I am submitting this declaration in support of the contemporaneously filed Motion for Approval of PAGA Settlement and my requested PAGA Representative Service Payment of up to five thousand dollars (\$2,500.00). I have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

5. As a result, I decided to file a lawsuit against Defendant. I met with my attorneys and explored my options. The operative Complaint resulted from multiple conversations I had with my attorneys and their staff regarding Defendant's policies and practices and corporate entities. I also understand that our operative Complaint has alleged, among other things, that Defendant failed to properly pay a weighted average for all overtime work. We have also alleged that Defendant failed to pay for times when we were interrupted while on our meal periods and required to work off the clock. I also alleged Defendant failed to reimburse for all necessary business expenditures, including maintaining Defendant's uniform. We have also alleged claims for failure to provide

1 required meal and rest periods, and for other violations related to Defendant's failure to pay us all  
2 wages and provide all breaks.

3 6. From the beginning of my involvement in this case, my attorneys informed me about  
4 what it meant to be a PAGA Representative. I understood that I was a proxy for the State of  
5 California seeking to enforce the California Labor Code for the aforementioned violations. I  
6 understood and believed the way that Defendant failed to pay me was the same as the way they  
7 failed to pay all other employees who worked for Defendant. I am happy that I was able to bring a  
8 lawsuit as a PAGA representative to try and obtain civil penalties on behalf of the California Labor  
9 and Workforce Development Agency.

10 7. I understood that this action was being prosecuted on behalf of the State of  
11 California as a private attorney general on my behalf and other aggrieved employees. I have spent a  
12 significant amount of time discussing this matter with my attorneys, explaining the company  
13 policies and practices, as I understood them, as well as reviewing the company documents provided  
14 to me by my attorneys.

15 8. I have actively participated in this litigation and have been updated of the progress of  
16 the case. I have provided documents to Plaintiff's counsel in support of the PAGA claims and spent  
17 many hours discussing my claims and information regarding my employment by Defendant. I have  
18 also invested significant time and efforts in performing my duties on behalf of the State of  
19 California and other aggrieved employees, including during the initial complaint drafting process,  
20 in response to informal discovery before mediation, and answering questions, in connection with  
21 the mediation and ongoing settlement negotiations, agreeing to our efforts to combine the cases, and  
22 now throughout the Settlement approval process.

23 9. In addition to the time I spent serving as a PAGA representative in this action, I have  
24 spent time speaking with my counsel to receive answers to my questions or updates on the case  
25 progression. I estimate I have devoted approximately at least thirty (30) hours of my time as a  
26 PAGA Plaintiff representing the interests of the state of California, including by performing the  
27 following:

- 28 a. Researching the issues and claims I could bring against Defendant and talking to my  
attorneys about initiating this action;

- 1           b.       Being interviewed in detail by my counsel regarding the working conditions we  
2           operated under for Defendant, and particularly my experiences and the policies and practices  
3           that applied to my employment and the employment of the other similarly situated  
4           employees;
- 5           c.       Searching for and gathering relevant documents in my possession and providing  
6           them to my attorneys, and reviewing documents provided by Defendant;
- 7           d.       Speaking with and informing my attorneys and addressing how my experiences were  
8           similar to my co-workers and responding to questions from Plaintiffs' counsel and from  
9           Defendant in preparation for mediation;
- 10          e.       Preparing for mediation session and reviewing settlement related documents and  
11          working with counsel to prepare and provide executed final versions of the Settlement  
12          Agreement and also for the Joint Prosecution Agreement. I have also worked with counsel  
13          in connection with the motion for approval of this PAGA settlement; and
- 14          f.       Regularly receiving and responding to correspondence and phone calls from my  
15          attorneys and sending many e-mails regarding the claims and case status and then the  
16          Settlement and other related documents.

17          10.       I took a huge risk by coming forward to help with this PAGA action by serving as  
18          the named Plaintiff. I also believe the Settlement obtained on behalf of the State of California is fair  
19          and reasonable in view of the facts, claims and the risk of going through further litigation in this  
20          case.

21          11.       I have reviewed with counsel the Settlement Agreement we have negotiated with  
22          Defendant in this action on behalf of the State of California. I agreed to the terms because I believe  
23          the Settlement is fair and reasonable. I understand that once the Court grants approval of the PAGA  
24          Settlement and approves me to serve as one of the PAGA Representatives, the action will proceed  
25          with settlement administration.

26          12.       In my opinion, the requested PAGA Representative Payment of two thousand five  
27          hundred dollars (\$2,500.00) is fair and reasonable given the risks I have taken, the tasks I have  
28          performed, the time I have invested, and the real benefit which the State of California and aggrieved  
29          employees will receive from this PAGA action.

13. I understand my requested two thousand five hundred dollars (\$2,500.00) incentive payment is subject to the Court's final approval and discretion, and I respectfully request that the Court approve awarding it and approve me to serve as a PAGA Representative for Settlement purposes.

14. I am not aware of any actual or potential conflict of interest with Aggrieved Employees and or the Settlement Administrator.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 09 / 19 / 2024.

Andrew Tarigan

ANDREW TARIGAN