

Edwin Aiwazian (Cal. State Bar No. 232943)
edwin@calljustice.com
Joanna Ghosh (Cal. State Bar No. 272479)
joanna@calljustice.com
Selena Matavosian (Cal. State Bar No. 348044)
selena@calljustice.com
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Nelson Ramirez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NELSON RAMIREZ, individually, and
on behalf of other members of the
general public similarly situated and on
behalf of other aggrieved employees
pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

HV GLOBAL MANAGEMENT
CORPORATION, an unknown business
entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 5:21-cv-09955-BLF

Honorable Beth L. Freeman
Courtroom 3

**DECLARATION OF NELSON
RAMIREZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
and PAGA Settlement; Declaration of
Proposed Class Counsel (Selena
Matavosian); and [Proposed] Order
filed concurrently herewith]

Date: July 11, 2024
Time: 9:00 a.m.
Courtroom: 3

Complaint Filed: November 3, 2021
FAC Filed: February 22, 2022
SAC Filed: August 4, 2022
TAC Filed: February 2, 2023
FAC Filed: February 17, 2024
Trial Date: None Set

DECLARATION OF NELSON RAMIREZ

I, Nelson Ramirez, hereby declare as follows:

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.

2. I have been employed by HV Global Management Corporation (“HV Global”) in an hourly-paid, non-exempt position from approximately September 2009 to approximately September 2019. I decided to seek legal advice about my work experiences with HV Global. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure that HV Global was held accountable for not paying its non-exempt, hourly-paid employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Afterwards, I consulted with the attorneys at Lawyers *for* Justice, PC for **7 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to commence the lawsuit and be a named plaintiff, class representative, and eventually, a PAGA representative.

3. I have spent over **23 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with HV Global, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from HV Global. I routinely checked in with my attorneys and their staff to make

1 sure they had all of my most current information and any additional information
2 that I had obtained.

3 4. As the case progressed, I was available to answer any questions my
4 attorneys had, and available to speak and meet with my attorneys whenever they
5 needed me. I responded to them as quickly as possible and gave them as much
6 information and identified as many documents as I could. I spent at least **13**
7 **additional hours** speaking with my attorneys about the case, identifying potential
8 witnesses, providing my attorneys with documents and information concerning the
9 case, and also describing policies, practices, and procedures of HV Global. During
10 the discovery phase of the litigation, I spent approximately 6 additional hours
11 reviewing HV Global's discovery requests, locating documents, and providing
12 documents, responses, and supplemental responses to my attorneys.

13 5. On September 6, 2023, I attended a full day of deposition that lasted
14 approximately **8 hours**. I spent at least **5 hours** preparing for the deposition and
15 approximately **4 additional hours** traveling to and from the deposition. After the
16 deposition, I spent at least **2 hours** reviewing my testimony and discussing the
17 contents of the deposition transcript with my attorneys.

18 6. As far as the settlement is concerned, I was available to review
19 documents and answer any questions my attorneys had. I spent about **3 hours**
20 reviewing the settlement documents and about **3 hours** asking questions and
21 discussing the settlement with my attorneys before signing the settlement
22 agreement.

23 7. I believe that I have done everything that my attorneys have asked of
24 me and have tried, to the best of my ability, to represent the class and seek relief
25 for the aggrieved employees and the State of California. I think my efforts have
26 helped to obtain the result in this case, and as a class and PAGA representative, I
27 respectfully request that the Court award me an enhancement payment in the
28 amount of \$15,000.00 for my active participation in this case. Taking into

1 consideration the time that I have dedicated to this case, I believe that this amount
2 is reasonable.

3 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

4 9. I have not entered into any undisclosed agreements, nor have I
5 received any undisclosed compensation in this case. The only compensation I will
6 receive is whatever amount the Court awards as an enhancement payment, as well
7 as my share of the settlement as a class member and as an aggrieved employee.

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

10 Executed this ^{04/09/2024} day of April 2024, at Monterey, California.

11 
12 Electronically Signed 2024-04-10 00:31:54 UTC - 166.198.34.103
13 Nintex AssureSign® 6226365c-3eab-4e30-924a-b14d0180285

14 Nelson Ramirez
15
16
17
18
19
20
21
22
23
24
25
26
27
28