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8 Attorneys for Plaintiff,

9 ADOLFO LOZOYA RAMIREZ, and all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT**

12 **(UNLIMITED JURISDICTION)**

13 ADOLFO LOZOYA RAMIREZ, as an
14 “aggrieved employee” on behalf of himself
15 and other similarly situated “aggrieved
16 employees” under the Labor Code Private
17 Attorneys General Act of 2004,

18 Plaintiff,

19 vs.

20 BEMUS LANDSCAPE, INC., a California
21 corporation; and DOES 1 to 25, inclusive,

22 Defendants.

Case No.: 24STCV08944

**DECLARATION OF ADOLFO LOZOYA
RAMIREZ IN SUPPORT OF PLAINTIFF’S
UNOPPOSED MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Action filed: April 9, 2024

Hearing Date: December 10, 2025

Hearing Time: 8:30 a.m.

Hearing Dept: 19, Hon. Doreen B. Boxer

Reservation Number: 485399138207

1 **DECLARATION OF ADOLFO LOZOYA RAMIREZ IN SUPPORT OF**
2 **PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT**

3 I, ADOLFO LOZOYA RAMIREZ, declare and state as follows:

4 1. I am a resident of the State of California and am over 18 years of age. I am the
5 named Plaintiff in this action and am represented by Maralle Messrelian of MM Law, APC in
6 this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this
7 declaration and could and would competently testify thereto if called upon to do so as a witness.

8 2. I first started working for Defendant BEMUS LANDSCAPE, INC. ("BEMUS"
9 or "Defendant") as a driver and laborer in or around September 2023. My employment with
10 Defendant ended on or around January 19, 2024.

11 3. I understand that this lawsuit is a Private Attorney General action, otherwise
12 known as a PAGA lawsuit. I understand that I am the Plaintiff and that BEMUS is the Defendant.
13 I understand that my name is on the cover of the lawsuit. I understand that I am the representative
14 of other BEMUS employees. As the representative in this lawsuit, I have duties to the State of
15 California and other employees like me who were not paid for all hours worked at the correct
16 rates of pay, provided all required meal and rest periods, and reimbursed for necessary business
17 expenses, such as personal mobile phones for work purposes. I also understand that my lawsuit
18 is on behalf of the State of California. I have fairly represented the other employees and the State
19 throughout this lawsuit.

20 4. I understand that the Court will decide whether to approve the Settlement if it is
21 in the best interests of Defendant's other hourly employees and the State. I don't have any
22 disagreements with the other BEMUS employees I represent. I am not aware of any reason why
23 I can't make the best decisions for them in this lawsuit.

24 5. I understand that my attorneys have asked the Court to pay me \$1,000.00 as a
25 Service Award for serving as the representative plaintiff in this Action. I believe this amount is
26 fair for the time I have spent and my involvement in this lawsuit. I also believe it is fair because
27 of the risk that the Court could order me to pay BEMUS's court costs if I lose the case. I think
28 it is fair that the Court pay me the \$1,000 award for these reasons and others I list below.

 6. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would

1 be the representative of the other employees and the State of California. In agreeing to be their
2 representative, I agreed that the interests of the other employees and the State in the lawsuit are
3 as important as my personal interests in suing BEMUS. I agreed that I would do what is in the
4 best interest of the other employees and the State when deciding whether or not to settle this
5 lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only
6 be a settlement of the lawsuit if the Court allows it.

7 7. The PAGA statute does not forbid service awards. Courts frequently award them
8 in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys,
9 speaking with my attorneys on many occasions by phone, explaining what my employment at
10 BEMUS was like, explaining what my employment at BEMUS had in common with other
11 employees who worked for BEMUS, explaining my claims to my attorneys, and communicating
12 with my attorneys about the settlement agreement and related documents. I have also carefully
13 reviewed the Settlement agreement and other documents to make sure that the Settlement and
14 other work my attorneys performed are in the best interests of the employees I represent and the
15 State of California.

16 8. Because I filed this lawsuit, there is a public record at the Court showing my
17 name on the cover of the complaint for anyone to see. Any potential employer who finds the
18 lawsuit will know I sued a former employer. This could hurt my reputation. This could prevent
19 a potential employer from choosing to hire me. An award of \$1,000.00 is not equal to the harm
20 I would suffer if I can't find another job in the future.

21 9. Based on the time I have spent on the lawsuit, the risk I will have to pay
22 BEMUS's court costs if I lose, and the harm to my chances of getting jobs in the future, my
23 request for an award of \$1,000 is fair and reasonable.

24 I declare under the penalty of perjury of the laws of the State of California that the
25 foregoing is true and correct to the best of my knowledge.

26 Executed on November 10, 2025 at Santa Ana, California.

27 

Adolfo lozoya ramirez (Nov 10, 2025 10:15:03 PST)

28 ADOLFO LOZOYA RAMIREZ,
Declarant