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County of Santa Clara,
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Reviewed By: S. Rodriguez
Case #23CV428021
Envelope: 20168549**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

JEFFERSON RODRIGUEZ, 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,

v.

STATEWIDE TRAFFIC SAFETY AND
SIGNS, INC., a Delaware corporation now
doing business as AWP SAFETY; TRAFFIC
SOLUTIONS CORPORATION; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 23CV428021

CLASS ACTION

*[Assigned for all purposes to the Hon.
Theodore C. Zayner, Dept. 19]*

**DECLARATION OF DANIELLE
ANDREA PEREZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: August 13, 2025

Time: 1:30 PM

Dept.: 19

Action Filed: December 22, 2023

Trial Date: Not Set

1 **DECLARATION OF PLAINTIFF DANIELLE ANDREA PEREZ**

2 I, Danielle Andrea Perez, declare as follows:

3 1. I am an adult resident of the State of California, and, if called as a witness in this
4 action, I would testify truthfully to the matters described in this declaration. All of the matters
5 described in this declaration are within my personal knowledge, except those matters that are stated
6 to be upon information and belief. As to such matters, I believe them to be true.

7 2. I make this declaration entirely of my own free will and choice. I have not been
8 promised any benefit for doing so, and I have not been pressured into giving this declaration.
9 Before signing this declaration, I was given the opportunity to review it, make changes, and verify
10 the accuracy of its contents.

11 3. I am a former employee of Statewide Traffic Safety and Signs, Inc. (“Defendant”).
12 I worked for Defendant from approximately June 2020 to approximately May 2023 as an hourly-
13 paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of
14 Defendant’s policies and practices that have been alleged as unlawful in the Class Action
15 Complaint and Private Attorneys General Act (“PAGA”) Notice sent to Defendant and the Labor
16 & Workforce Development Agency (“LWDA”).

17 4. I initiated this lawsuit because I was concerned that I was not paid properly for all
18 the hours that I worked, and I was not provided all of my meal and rest breaks. By originating this
19 lawsuit as a class representative, I hoped that I might be able to change Defendant’s policies to
20 better protect the working conditions of my co-workers. I also understood that it was my duty as
21 a class representative to represent the best interests of the class, know about the lawsuit, assist my
22 attorneys, and keep updated on the case.

23 5. Throughout this case, I spent a lot of time on the phone with my attorneys to get
24 updates about the case and provide them with information. For example, during some of the phone
25 calls, my attorneys and I were able to identify instances when I was not paid correctly.
26 Additionally, leading up to the mediation in November 2024, I had multiple lengthy phone calls
27 with Wilshire Law Firm regarding the claims at issue and what was to transpire at the mediation.
28

1 6. I have invested a lot of personal time and energy into this lawsuit As detailed more
2 fully below, I have spent approximately 60 hours on this case. I made it a priority to be actively
3 involved because I wanted to do everything I can to assist my attorneys in prosecuting this case.
4 In fact, I have been in communication with other class members to learn about their experiences
5 while employed by Defendant to assist with the investigation into the claims of this case.

6 7. Throughout the case, I also spent time looking for documents relevant to the case to
7 send to my attorneys. I spent numerous hours looking for these documents, including when I first
8 contacted my attorneys, before my attorneys filed the case, and before my case was mediated. I
9 also spent time reviewing legal documents in this case, including the retainer and settlement
10 agreement and discussed, in detail, the terms with my attorneys.

11 8. Additionally, I made myself fully available on the day of mediation and was in
12 continuous contact with my attorneys to assist with any questions or issues that may have arisen.

13 9. I did not make the decision to file a class action lightly. I was concerned by the
14 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
15 associated with a lawsuit that I filed against my former employer. I am mindful that prospective
16 employers might find out that I sued Defendant. Nevertheless, I felt that important rights were at
17 stake that hurt everyone, and something ought to be done about it.

18 10. I also understand that there was financial risk in bringing this lawsuit. For example,
19 I knew that if I did not prevail in this lawsuit that I could potentially be responsible for Defendant's
20 attorneys' fees and costs. Coupled with that, I have struggled financially to pay housing costs and
21 utilities through this case and was forced to borrow money from family members in order to cover
22 these costs. Therefore, I was well aware of the financial risks of a potentially lengthy case.

23 11. I believe the settlement is a good settlement and I would recommend that the Court
24 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
25 had the opportunity to represent the class in this lawsuit and that I was able to recover money
26 through a settlement for the class.

27 12. I understand that the settlement agreement provides a service payment to me of up
28 to \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for

1 helping to prosecute this case, and the risks with respect to my future employment. In addition, the
2 settlement requires that I enter into a general release, which I understand is broader than the release
3 that will bind other class members. I am receiving no additional compensation to that provided for
4 in the settlement.

5 13. Based on my involvement in this case and the benefits provided to my former co-
6 workers, I can say I helped stand up for the other workers who were too afraid to say anything to
7 management because they did not want to risk losing their jobs or risk the stigma of suing an
8 employer. I was not afraid to take that risk because I strongly care about helping out my former
9 co-workers.

10 14. I have no conflicts of interest with any class member or the Settlement
11 Administrator, Phoenix Settlement Administrators.

12 15. I am not aware of any other pending matter or action asserting claims that will be
13 extinguished or adversely affected by the Settlement.

14 16. I reviewed (and ultimately signed) the Class Action and PAGA Settlement
15 Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms
16 and allocations are fair, adequate, and reasonable given the strength of the class claims and
17 Defendant's defenses.

18 I declare under penalty of perjury under the laws of the State of California and the United
19 States that the foregoing is true and correct.

20 Executed on Jul 17, 2025, at Kerman, California.

21
22 

Danielle Perez (Jul 17, 2025 17:17 PDT)

23 Danielle Andrea Perez
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PROOF OF SERVICE

Rodriguez, et al. v. Statewide Traffic Safety and Signs, Inc., et al.
23CV428021

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Rebecca Padilla, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 660 S. Figueroa St, Sky Lobby, 12th Floor, Los Angeles, California 90017. My electronic service address is rebecca.padilla@wilshirelawfirm.com.

On **July 21, 2025**, I served the foregoing **DECLARATION OF DANIELLE ANDREA PEREZ IN SUPPORT OF PLAINTIFF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

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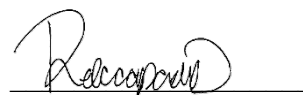
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Attorneys for Defendant

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

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

Executed on **July 21, 2025**, at Los Angeles, California.


Rebecca Padilla