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Attorneys for Plaintiff Roque Zarate Jr., individually and
on behalf of all similarly situated individuals and all
“aggrieved employees” pursuant to Labor Code

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

ROQUE ZARATE JR., individually and
on behalf of all similarly situated
individuals and all “aggrieved employees”
pursuant to Labor Code § 2698 et seq.,

Plaintiff,

v.

BILLY CHARLES CRAWFORD AND
CODY ALAN CRAWFORD, individuals
doing business as CRAWFORD
ASSOCIATES, and DOES 1 through 50,
inclusive,

Defendants.

CASE NO: CVRI2403196

Assigned to the Hon. Harold W. Hopp, Dept. 1

CLASS ACTION

**DECLARATION OF ROQUE ZARATE JR.
IN SUPPORT OF UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: April 24, 2025

Time: 8:30 a.m.

Dept.: 1

RESERVATION ID: 693136276940

Complaint Filed: June 10, 2024

1 I, ROQUE ZARATE JR., hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against BILLY CHARLES CRAWFORD
3 and CODY ALAN CRAWFORD, individuals doing business as CRAWFORD ASSOCIATES
4 (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion for
5 Preliminary Approval of Class Action Settlement. I am a competent adult and worked for
6 Defendant as a non-exempt employee in Riverside County during the relevant time period. I have
7 personal knowledge of the facts set forth herein, and if called as a witness to testify to them, I
8 could and would do so competently.

9 2. I contacted my current attorneys when I questioned the employment practices of
10 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class
11 Representative in a class action on behalf of other employees of Defendant whom I believed were
12 being subjected to labor law violations. Although presented with the opportunity, I did not pursue
13 this case on an individual basis and instead did so as a class action so that I could help other
14 employees recover for what I believed were Defendant’s illegal practices.

15 3. Specifically, I questioned Defendant’s policies of failing to pay all wages; failing to
16 provide all meal and rest periods; failing to timely compensate employees upon separation; and
17 issuing its employees deficient wage statements. Through many discussions with my lawyers, I
18 learned these may be illegal practices and Defendant’s employees might have recourse for them.

19 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
20 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
21 this case resolved itself favorably, but always knew that I could also be responsible for paying
22 Defendant’s attorneys’ fees and costs if it did not. My goal in bringing this lawsuit was to obtain
23 a recovery on behalf of the class, and even more importantly, to put an end to what I believed were
24 illegal practices on the part of Defendant. I believe I have achieved both through this lawsuit and
25 settlement.

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1 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
2 compensating class members for unpaid wages, premium wages for missed meal and rest periods,
3 penalties, and interest that I believe we are due.

4 6. At the onset of this case, I spent time through numerous phone calls with several of
5 my attorneys explaining what I understood to be the policies and procedures of Defendant and
6 how they were applied to me and others I worked with. During the course of this litigation, up
7 through and following the settlement process, I kept actively involved with its status, tracking the
8 status of the case and participating as much as possible.

9 7. While I have not maintained detailed time records of my activities in connection
10 with this litigation, I believe that have spent and will spend a total of approximately 30 hours
11 assisting my attorneys with the preparation of this case, and doing work and analysis independent
12 from my attorneys both before and during this case, including conducting an independent
13 investigation of the facts.

14 8. Before this litigation commenced, and throughout its course, I have spent
15 approximately 12.5 or more hours gathering, organizing, and reviewing documents and
16 information for this lawsuit. I sifted through many of my own documents and reviewed
17 information produced by Defendant as part of this case.

18 9. I have communicated with my attorneys several times per month to track my case's
19 status. I have taken an active involvement in this matter throughout its course.

20 10. This lawsuit will almost certainly result in reputational harm to me. There is a
21 stigma associated with suing anyone, let alone your former employer. I will probably be adversely
22 affected when it comes to obtaining future employment – employers who learn that I sued
23 Defendant in a class action will likely avoid hiring me.

24 11. I do not believe that I have any conflicts with other members of the class. My
25 interests in bringing this lawsuit – for Defendant to change its labor practices going forward and
26 to compensate current and former employees – are the same as those of all other class members.
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1 I declare, under penalty of perjury, under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on 03 / 14 / 2025 at Blythe, California.

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6 ROQUE ZARATE JR.