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Attorneys for Plaintiff CECILIA ESTRADA,
individually and on behalf of others similarly
situated employees and aggrieved employees
pursuant to the California Private Attorneys
General Act

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

CECILIA ESTRADA, individually and on behalf
of others similarly situated employees and
aggrieved employees pursuant to the California
Private Attorneys General Act,

Plaintiff,

vs.

THE ROMAN CATHOLIC ARCHBISHOP OF
LOS ANGELES; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: 24STCV07184

*Assigned for all purposes to Hon. Laura Seigle
Dept. 17*

**DECLARATION OF PLAINTIFF
CECILIA ESTRADA IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date:
Time:
Dept: 17

[Filed Concurrently with Gold Declaration;
Mullins Declaration; and Motion for Preliminary
Approval of Class & PAGA Settlement]

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1 much information as I could. Additionally, I helped my attorneys respond to written discovery, and
2 met with them in order to prepare for my deposition, which took place in January 2025.

3 6. I understood that in the event this matter did not settle and proceeded with trial, I would
4 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
5 responsibilities that are necessary for this lawsuit.

6 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
7 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
8 also understood there was a risk of losing any job and/or income due to the time that I would have to
9 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
10 importantly, I believe that by pursuing this case, I have taken a significant risk because future
11 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
12 to find employment within this industry – and even outside of it – in the future. In contrast, the other
13 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
14 that I took in bringing this action.

15 8. I reviewed the settlement agreement, discussed the settlement agreement with my
16 attorneys, and asked them questions before signing it.

17 9. I believe that I have done everything that my attorneys have asked of me and tried, to
18 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
19 I have spent approximately 45-50 hours participating in this case as described above. I believe my
20 efforts helped get the result obtained in this case.

21 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
22 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
23 throughout the course of this litigation I have considered the interests of the Class and put them before
24 my own personal interests.

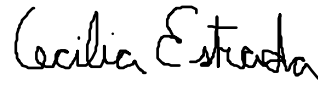
25 11. I understand that incentive or enhancement awards are discretionary and intended to
26 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
27 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
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1 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
2 my work in this matter is meritorious on these points for the reasons set forth above.

3 12. I respectfully request that the Court approve and award me an Enhancement Payment
4 in the amount of \$10,000 for my efforts and active participation in the case and for the broader, general
5 release of all claims that I have or may have against Defendant in connection with the settlement.
6 Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

7 14. I am not related to anyone associated with Blackstone Law, APC.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed on 02/27/2025, at Ontario, California.

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13 Cecilia Estrada
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