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8 Attorneys for Plaintiff,
9 JOSE I. SORIANO RODRIGUEZ, and all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN FRANCISCO**
12 **(UNLIMITED JURISDICTION)**

13 JOSE I. SORIANO RODRIGUEZ, on
14 behalf of himself and all others similarly
15 situated, and the general public, and as an
16 “Aggrieved Employee” on behalf of other
17 “Aggrieved Employees” under the Private
18 Attorneys General Act of 2004,

19 *Plaintiff(s),*

20 vs.

21 EVENTS MANAGEMENT, INC. DBA
22 MCCALLS CATERING & EVENTS, a
23 California corporation; and DOES 1 to 25,
24 inclusive,

25 *Defendants.*

Case No.: CGC-24-615022

26 **SUPPLEMENTAL DECLARATION OF JOSE**
27 **I. SORIANO RODRIGUEZ IN SUPPORT OF**
28 **PLAINTIFF’S UNOPPOSED MOTION FOR**
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT

Action filed: 5/28/2024
Hearing Date: 10/1/2025
Hearing Time: 1:30 p.m.
Hearing Dept: 304, Hon. Ethan P.
Schulman

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1 de minimis time, or “good-faith” disputes) are the same defenses it would assert against other
2 Class Members. Accordingly, my circumstances are typical of the Class because they stem from
3 the same policies and practices and turn on the same legal theories.

4 5. I understand that the Settlement in this case is subject to this Court’s approval to
5 ensure that it is in the best interest of the Class as a whole. I have no conflicts with the Class.

6 6. I understand that my attorneys are submitting an application to this Court for a
7 Class Representative Enhancement Payment to compensate me for my unique contributions to
8 the success of this action as the Class Representative in the amount of \$10,000.00. I believe this
9 amount is fair and reasonable compensation for my efforts in this case and the risks I have taken
10 in pursuing a fair recovery for the Class Members.

11 7. I have provided Defendant with a general release of any and all claims, known
12 or unknown, I may have against Defendant. By agreeing to settle the case in the best interest of
13 the Class Members, I have given up the right to pursue my individual claims for unpaid wages
14 and penalties and to recover substantially more for unpaid wages, interest, waiting time
15 penalties, and pay stub penalties. I did not seek an individual settlement for my claims at all,
16 instead choosing to prosecute this matter on behalf of my coworkers. By pursuing the claims of
17 all Class Members, I have also rendered my own individual payment uncertain and delayed its
18 payment by several months (at the least).

19 8. As Class Representative, I assumed a fiduciary role to the Class. I agreed to (1)
20 consider the interests of the Class just as I would consider my own interests and, in some cases,
21 to put the interests of the Class before my own interests; (2) actively participate in the lawsuit,
22 as necessary, by among other things, producing documents to Defendant and giving depositions
23 and trial testimony if requested; (3) travel to give such testimony; (4) recognize and accept that
24 any resolution of the lawsuit by dismissal or settlement, is subject to court approval, and must
25 be designed in the best interest of the Class as a whole; (5) follow the progress of the lawsuit
26 and provide all relevant facts to my attorneys; (6) champion many other people with similar
27 claims and injuries because of the importance of the case and the necessity that all Class
28 Members benefit from the lawsuit; and (7) fight for a resolution in which the individual
recoveries to each Class Member, including me, maybe relatively small. I agreed to shoulder all
of these responsibilities in exchange for a proportionate share of funds made available for
distribution to the Class Members. I had no guarantee of a Class Representative Enhancement

1 Payment. I have spent a considerable amount of my time in connection with this case to date.
2 The activities I have performed have included, but have not been limited to: obtaining legal
3 counsel, speaking with my legal counsel on numerous occasions, over the phone, informing
4 them of the terms and conditions of my coworkers' employment, assisting them in gathering
5 information, identifying the claims brought in this case, gathering documents from my
6 employment with Defendant, and being actively involved in the settlement process to ensure a
7 fair result for the Class as a whole. I also spent time carefully reviewing the Settlement, and
8 other case related documents on my own and with my counsel to make sure that the Settlement
and other work my attorneys performed are in the best interest of the Class Members.

9 9. Further, my counsel have advised me of the possibility that, if the case was lost,
10 I could have been ordered to pay Defendant's costs and even attorneys' fees in this case, which
11 could have been thousands of dollars by the end.

12 10. Because I filed this lawsuit, there is a public record at the Court showing that I
13 brought a class action for unpaid wages against my former employer. The Class Representative
14 Enhancement Payment to me of \$10,000.00 is not equal to the harm to my future career
prospects that this case may cause me.

15 11. Based on the time, risk, stigma, loss of benefits and income and great outcome
16 of this case, I believe that the requested Class Representative Enhancement Payment for me is
17 fair and reasonable. As such, I respectfully request that the Court award the requested Class
18 Representative Enhancement Payment of \$10,000.

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

21 Executed on _____ in Daly City, California.

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24 JOSE I. SORIANO RODRIGUEZ,
Declarant