

David Mara, Esq., (SBN 230498)
Matthew Crawford, Esq., (SBN 310230)
MARA LAW FIRM, PC
2650 Camino Del Rio North, Suite 302
San Diego, CA 92108
Telephone: 619.234.2833
Facsimile: 619.234.4048

Attorneys for Plaintiff LUIS RAMIREZ, on
behalf of himself, all others similarly situated, and
on behalf of the general public.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

LUIS RAMIREZ on behalf of himself, all
others similarly situated, and on behalf of
the general public,

Plaintiff,

v.

ARGUS PROFESSIONAL STORAGE
MANAGEMENT, LLC; and DOES 1-
100,

Defendants.

Case No.: 24CV005325

**DECLARATION OF LUIS RAMIREZ IN
SUPPORT OF SETTLEMENT
APPROVAL**

I, Luis Ramirez, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am the named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for Defendant Argus Professional Storage Management, LLC (“Argus”) as a non-exempt, hourly employee in California during the Class Period.
4. Since becoming a class representative, I have diligently worked on this case. I always answered phone calls from my attorneys or called them back promptly when they called.
5. On many occasions, I spoke with my attorneys for case related purposes. I assisted my attorneys in investigating the case and reached out to them on numerous occasions to provide them with information about my time at Argus that I thought might help the case.
6. I also looked for any paperwork or documents, like my paystubs, from my employment with Argus to provide to my attorneys.
7. I was aware that, at some point in this case, I would have my deposition taken. I knew that the deposition could take a full day and that I may have to meet with my attorneys prior to my deposition. I was at all times ready and willing to sit for my deposition.
8. Although I did not attend the mediation in person, I was available on the phone for all the negotiations. I spoke with my attorneys regularly throughout the entire process to provide additional information my attorneys asked for and was kept informed on the status of the negotiations.
9. I gave my consent to settle with Argus for the gross settlement amount of \$273,500. I completely and carefully reviewed the settlement agreement. I then signed the settlement agreement.
10. I estimate that I spent approximately 33 hours or more on tasks like speaking with my attorneys, searching for documents, speaking with other employees, assisting in the mediation process, and reviewing the settlement documents.

1 11. In light of the work I performed in this case and the duties associated with being a class
2 representative in a case of this magnitude, I believe the \$7,500 class representative
3 enhancement payment is reasonable. I understand that this additional payment is not
4 guaranteed and is subject to Court approval.

5 12. I have and will continue to adequately represent all of the interests of the class. With my
6 status as class representative, I will treat the interests of the Class above my interests.

7 13. My claims are typical of the Class Members because I am similarly situated to all current
8 and former non-exempt, hourly employees who worked for Argus in California at any time
9 during the Class Period. Thus, my interests are the same as all members of the proposed
10 Class.

11 14. I recognize that any resolution of this matter must be approved by the Court in terms of
12 whether the settlement is fair and reasonable, and that I am obligated to protect the
13 interests of all of class members for the Class Period.

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

16 Dated: 3/7/2025

17 By:  Signed by:
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Luis Ramirez

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