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Attorneys for Plaintiff RACHAEL LIEBREGT

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

RACHAEL LIEBREGT, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

WORLD COURIER INC., a New York
corporation; WORLD CUSTOMS
BROKERAGE, INC., a Delaware corporation;
and DOES 1-50, Inclusive,

Defendants.

Case No. 24STCV05865

**DECLARATION OF RACHAEL LIEBREGT
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: October 28, 2025

Time: 10:00 a.m.

Judge: Hon. David S. Cunningham III

Dept: S11

1 I, RACHAEL LIEBREGT, declare as follows:

2 1. I am over the age of eighteen, a California resident, Plaintiff and a Proposed Class
3 Representative in the above-entitled matter. I submit this declaration in support of Plaintiff's Motion
4 for Preliminary Approval of Class Action and PAGA Settlement. I have personal knowledge of all the
5 facts stated herein. I could and would competently testify under oath to these facts in court if requested
6 to do so.

7 2. I am submitting this declaration in support of Plaintiff's Motion for Preliminary Approval
8 of Class and PAGA Action Settlement.

9 3. I believe that I am, have been, and will continue to represent the interests of the class
10 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
11 to represent. Specifically, I worked for Defendants from approximately September 2013 to November
12 2022 as a non-exempt employee. As a non-exempt employee compensated on an hourly basis, I was
13 entitled to legally mandated meal and rest periods and minimum wage and overtime compensation.
14 During my employment, Defendants failed to, among other things, provide compliant meal and rest
15 periods, issue compliant wage statements and pay all monies owed when due. Throughout my
16 employment, I was subject to Defendants' written policies and procedures.

17 4. My claims are typical of the claims of the Class Members who I am seeking to represent
18 because I was subject to the same alleged unlawful employment policies and practices at issue in this
19 action, including but not limited to, Defendants' failure to provide legally mandated meal and rest
20 periods, failure to provide compliant wage statements and failure to pay all monies owed when due.
21 Factually, Defendants' policies and practices apply class wide, and Defendants' liability can be
22 determined by facts common to all members of the Class.

23 5. Further, there is no conflict between my interests and the interests of the class that I am
24 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
25 I was injured by the same company-wide policies and practices to which the proposed Class was
26 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
27 of the Class by initiating this litigation, communicating with class counsel about the claims as they
28

1 apply to myself and others, undertaking extensive class document evaluation and evaluating the
2 proposed settlement to assure that it is fair.

3 6. I understood at the time that I filed this action, that as a Class Representative, I owed a
4 duty to the putative class members to faithfully prosecute this action with their best interests at the
5 forefront of every decision. I understood that I could not make any decision in this action for the sole
6 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
7 sacrifice my personal best interests for the benefit of the interests of the putative class members.
8 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
9 relief for my former co-workers for what I perceived to be Defendants' unlawful wage and hour
10 practices. I believe that I faithfully executed the duties of the Class Representative throughout this
11 litigation and will continue to do so until this litigation is fully and finally resolved.

12 7. I believe that the proposed settlement before the court is fair, reasonable and adequate,
13 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
14 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

15 I declare under the penalty of perjury under the laws of the State of California that the foregoing
16 is true and correct. Executed 05/24/2025, at Los Angeles, California (location/city), California.

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18 By:  Rachael Liebregt (May 24, 2025 10:47 GMT+2)
19 RACHAEL LIEBREGT