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Attorneys for Plaintiffs, the Putative Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

HELDER VIEIRA, TAVORIS SAUCIER,
ERIC BARBARY, ANDREW EMARY,
JASON SERIOS, BLONG YANG,
individually, and on behalf of all others
similarly situated,

Plaintiffs,

v.

ONE WORKPLACE L. FERRARI LLC, a
California limited liability company, doing
business as ONE WORKPLACE; and DOES 1
through 100, inclusive,

Defendant(s).

CASE NO.: 24CV447301

[Assigned for all purposes to Theodore C.
Zayner in Dept. 19]

**DECLARATION OF PLAINTIFF
HELDER VIERA IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Action Filed: September 13, 2024

FAC Filed: September 19, 2024

SAC Filed: August 4, 2025

Trial Date: Not Set

DECLARATION OF HELDER VIEIRA

1. I am a party to this action and reside in the State of California. I am fully competent to make this declaration. I have personal knowledge of the facts set forth herein, except for those stated on information and belief, and as to those I am informed and believe them to be true. If called upon to testify, I could and would testify as set forth herein.

2. I make this Declaration in support of Plaintiff's Motion for Final Approval of Class and Representative Action Settlement.

3. I was employed by One Workplace L. Ferrari, LLC dba One Workplace ("Defendant"), as a non-exempt, hourly-paid employee in California from February 13, 2017 through March 5, 2024. I held various positions including Installer, Quality Assurance Specialist, and Assistant Warehouse Supervisor, with duties that included, but were not limited to, monitoring inventory and providing customer service.

4. I am informed and believe that throughout my employment with Defendant myself and other non-exempt employees of Defendant were not paid all wages owed because we were not paid for all time under Defendant's control, or for which we were suffered or permitted to work by Defendant. In addition, I am informed and believe we were not paid all overtime hours worked at the overtime rate of pay owed due to, without limitation, failure to record all time worked and failure to pay for off-the-clock work.

5. During my employment with Defendant, I often took meal periods that were after the fifth hour, short, or not duty-free. I witnessed other non-exempt employees with my job duties often taking meal periods that were after the fifth hour, short, or not duty-free, as well.

6. I do not recall receiving any premium pay for the full, timely and uninterrupted meal periods I was not provided an opportunity to take and am informed and believe that my coworkers were not provided premium pay for not being provided with the opportunity to take full, timely and uninterrupted meal periods either.

7. I do not believe I was provided with opportunities to take full, uninterrupted 10-minute rest periods while working with Defendant and am informed and believe my coworkers were often not provided with such an opportunity, either.

1 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
2 an opportunity to take and am informed and believe that my coworkers were not provided
3 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute
4 rest periods, either.

5 9. Before and during the course of litigation, I was actively involved in assisting my
6 attorneys to support the wage and hour claims asserted. My involvement began before the initial
7 complaint was filed wherein, I provided first-hand knowledge and documentation as to
8 Defendant's practices, their ownership and corporate structure, and their wage and hour policies
9 and practices.

10 10. Part of the information I relayed was with regard to Defendant's timekeeping policies
11 and practices, and their meal and rest period policies and practices.

12 11. I provided them with all the documentation provided to me by Defendant during my
13 employment.

14 12. I assisted in reviewing time and payroll records with my attorneys, and informed
15 them of Defendant's employment policies, and whether those policies matched Defendant's
16 practices.

17 13. My attorneys called me to ask me questions many times throughout the litigation
18 and I contacted my attorneys several times to stay updated on the case and offer my assistance on
19 any matters I could be helpful with. I was also personally available for and attended the all-day
20 mediation, during which I was available to answer the questions posed by the mediator regarding
21 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my
22 attorneys over the next several months after mediation to understand and execute a long form
23 settlement agreement.

24 14. Over the past few months since this matter has resolved, I have stayed in touch with
25 my attorneys to ensure that there was no undue delay in payment for other class members for
26 whom I brought this Action.

27 15. I believe that, through the present, I have spent at least 26 hours in connection with
28 this matter, which included time spent having preliminary calls with my attorneys; doing an intake

1 with my attorneys; time spent searching for documents relating to my employment; time spent
2 reading and understanding the Settlement Agreement; time spent answering calls to discuss
3 Defendant's timekeeping, pay, meal and rest periods, and to review time and payroll records; time
4 spent discussing with my attorneys' Defendant's policies and practices; time spent on-call at
5 mediation; and time spent checking in on the status of the case, among other things. I also spent
6 time preparing this declaration to support Plaintiff's Motion for Final Approval of Class and
7 Representative Action Settlement.

8 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
9 rights of other employees who suffered from the same unfair wage practices. I felt that current
10 employees might not want to share their experiences with Defendant since they feared losing their
11 jobs. This is certainly understandable as I, too, have to provide for myself and others.

12 17. By bringing this lawsuit, I have put the interests of the class ahead of my own.

13 18. I understood that I could possibly earn a small enhancement if this case is resolved
14 favorably. I also knew that I could face retaliation from Defendant and backlash from former
15 coworkers who are loyal to Defendant. I have also had to provide a general release of claims to
16 Defendant as part of the settlement. My understanding, in addition, is that if I brought this case
17 individually, I may have earned more compensation individually and on a much quicker timeline
18 than the timeline to resolve this Action.

19 19. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class,
20 and, even more importantly, to put an end to what I believe are illegal practices on the part of
21 Defendant. I believe I have achieved both through this lawsuit and settlement.

22 20. I have no interest in or conflict with the cy pres recipient, Katherine and George
23 Alexander Community Law Center.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct this 24 day of April 2026, at San Jose, California.

26
27 Helder Vieira
28 HELDER VIEIRA