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7 Attorneys for Plaintiff AZIEL JOEY GOMEZ PEREZ
8 As an individual and on behalf of all others
9 similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12 AZIEL JOEY GOMEZ PEREZ, as an
individual and on behalf of all others
13 similarly situated,

14 Plaintiff,

15 v.

16 QANTAS AIRWAYS LIMITED, an
17 Australian corporation; and DOES 1-100,
18 inclusive,

19 Defendants.
20

Case No.: 23STCV18974

Assigned for All Purposes to:
Hon. Stuart M. Rice
Dept. SSC-1

DECLARATION OF AZIEL JOEY GOMEZ PEREZ

Date: May 5, 2025
Time: 10:30 a.m.
Dept.: SSC-1

1 I, AZIEL JOEY GOMEZ PEREZ, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

5 2. I worked for defendant Qantas at LAX as an hourly-paid Aircraft Maintenance
6 Engineer, from approximately February 2019 through September 2021. While I worked their I don't
7 think I was paid properly for all of the hours I worked, and many times I had to work off the clock
8 due to the press of business and the need to get aircraft ready on time so that their schedules
9 weren't delayed. We were expected to service aircraft as they arrived and not keep them waiting,
10 which would interrupt airport operations, and many times work schedules didn't accommodate
11 unanticipated arrivals or delays and as a result I had to start work early or work after the scheduled end
12 of a shift. I don't think all of this extra time was recorded or paid for, or if it involved overtime I don't
13 I always received my full overtime rate. For the same reasons I regularly worked through at least part
14 of a meal period, taking approximately 15 minutes to eat, then had to return to work to meet
15 operational needs. Rest breaks also typically were only about 5 minutes, primarily to use the restroom.
16 I also had to use my own phone for company business, such as being on call and available to work
17 on an aircraft as necessary, and I never received any reimbursement.

18 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
19 employee of Defendant, especially with regard to me not receiving all of the pay I believe I
20 earned, not getting all my lunches and breaks like I was supposed to, and not getting anything for
21 using my own phone for work.

22 4. It is my understanding this lawsuit could not have been prosecuted or settled on
23 behalf of the Class unless I or some other current or former employee decided to serve as a named
24 plaintiff and proposed class representative. In deciding to serve as a named plaintiff and proposed
25 class representative in this case, I understood that my name could be publicly attached to this
26 lawsuit and that my work experiences to some extent would be set forth in a public court file. I
27 recognized I would need to devote a certain amount of time that I could have spent otherwise. I
28

1 also recognized my bringing the lawsuit carried some degree of risk for defendants' legal costs
2 among other things. Despite this, I decided to serve as the named plaintiff and proposed class
3 representative, without any promise of recovery or compensation.

4 5. I am familiar with the work involved in prosecuting this case. I have participated in
5 meetings, phone calls, and other communications with my lawyers regarding this case. I am
6 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
7 events in this case, including the investigation performed by my lawyers, the mediation with
8 Defendant that resulted in this settlement, and the preparation of settlement papers and the need to
9 obtain court approval of the proposed settlement. I participated in the litigation and provided my
10 lawyers with information and documents regarding my employment with Defendant.

11 6. I believe that the proposed class-wide settlement obtained on behalf of the Class
12 and other aggrieved employees is excellent in view of the issues and risks involved with the case.

13 7. I believe I have fulfilled my duties as a proposed class representative, which
14 required a significant amount of time and effort during the course of this case. These efforts
15 required dedicating numerous hours to lawsuit activities including, but not limited to: (a)
16 communicating with my attorneys to stay informed of ongoing developments in the case and to
17 discuss the proposed settlement ultimately negotiated; (b) searching for and providing documents
18 and other materials relating to my work experience; (c) responding to requests for information
19 relating to my work experience; and (d) reviewing filings and key documents including drafts of
20 the complaint and the settlement agreement. These tasks required my dedication of at least 20
21 hours of my time, which time I honestly could have spent on family, personal time, or work. My
22 understanding is that future tasks may require several more hours of my time. Further, at all times
23 I was ready, willing and able to testify at deposition and/or trial. I believe I have been diligent and
24 that I have acted above and beyond that of which is expected of a named plaintiff and proposed
25 class representative to date and will continue to do so. To the best of my knowledge I have not
26 conflicts of interest of any kind with any other class member.

27 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as the
28 named plaintiff and proposed Class Representative, and in consideration for my general release of

1 all claims against Defendant. I believe that amount is fair and reasonable in view of the work I
2 have and will continue to perform on behalf of the Class. I believe that my role as the class
3 representative in this lawsuit has resulted in a valuable benefit to the Class Members, and I
4 accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful
5 in this lawsuit. I believed in this case, so I was willing to be the named plaintiff and proposed class
6 representative to risk this and pursue this class action litigation. I also accepted the risk that news
7 of this lawsuit could also potentially impact my ability to secure other work.

8 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and
9 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

10 I declare under penalty of perjury under the laws of California that the foregoing is true
11 and correct. Executed on 03 / 12 / 2025, at Los Angeles, California.

12
13 

14 Aziel Joey Gomez Perez