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9 MARCOS O. RODRIGUEZ-CORONA

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

11 **FOR THE COUNTY OF SAN MATEO**

12 **(UNLIMITED JURISDICTION)**

13 MARCOS O. RODRIGUEZ-CORONA,

Case No.: 25-CIV-07290

14 *Plaintiff,*

15 **DECLARATION OF MARCOS
RODRIGUEZ-CORONA IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
FOR APPROVAL OF PAGA SETTLEMENT**

16 vs.

17 LA TAPATIA LLC, a California limited
18 liability company; HUMBERTO CAMPOS,
19 an individual; BARBARA HARO, an
20 individual; and DOES 1 to 25, inclusive,

Action filed: September 17, 2025
Hearing Date: February 18, 2027
Hearing Time: 2:30 p.m.
Hearing Dept: 2, Hon. Marc A. McCannon

21 *Defendant(s).*

**DECLARATION OF MARCOS RODRIGUEZ-CORONA IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT**

I, MARCOS RODRIGUEZ-CORONA, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Maralle Messrelian of MM Law, APC in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendants LA TAPATIA, LLC, HUMBERTO CAMPOS and BARBARA CAMPOS ("LA TAPATIA") on or about October 5, 2020, as a Factory Assistant at their restaurant and grocery store located at 411 Grand Ave., South San Francisco, California 94080. During my employment, I also held the position of Factory Cook. I worked for LA TAPATIA continuously until on or about September 18, 2024, when my employment was terminated.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that LA TAPATIA, LLC, HUMBERTO CAMPOS and BARBARA CAMPOS are the Defendants. I understand that my name is on the cover of the lawsuit and that I am acting as a representative of other LA TAPATIA employees. As the representative in this lawsuit, I understand that I have duties to the State of California and to the other employees with respect to the alleged violations of the California Labor Code asserted in the lawsuit. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other LA TAPATIA employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing LA TAPATIA. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them

1 in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys,
2 speaking with my attorneys on many occasions by phone, explaining what my employment at
3 LA TAPATIA was like, explaining what my employment at LA TAPATIA had in common with
4 other employees who worked for LA TAPATIA, explaining my claims to my attorneys,
5 participating in mediation, and communicating with my attorneys about the settlement
6 agreement and related documents. Despite this, I am **not** asking for a service award for my
involvement and the time I spent assisting my counsel with the PAGA action.

7 6. I negotiated an individual settlement of my retaliation and wrongful termination
8 claims, which is contingent upon approval of the PAGA claim, during the parties' global
9 mediation, which also resulted in the settlement of the PAGA action.

10 7. As part of my individual settlement, I signed a general release of all claims,
11 whether known or unknown, that I may have against Defendants, not only PAGA claims.

12 8. I don't believe that my individual settlement has any bearing on whether I have
13 served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am
14 willing to provide it to the Court *in camera* if the Court so requests.

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

17 Executed on April 20, 2026 at South San Francisco, California.

18 

19 Marcos Rodriguez-Corona (Apr 20, 2026 17:45:53 PDT)

20 MARCOS RODRIGUEZ-CORONA,
21 Declarant