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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

DEVONTE ROJO, an individual, in his
representative capacity on behalf himself, the
State of California, as a private attorney
general,

Plaintiff,

v.

FOREST LAWN MORTUARY, a California
corporation; FOREST LAWN MEMORIAL-
PARK ASSOCIATION, a California
corporation; and DOES 1-50, Inclusive,

Defendants.

Case No.: 23STCV02200

**DECLARATION OF PLAINTIFF
DEVONTE ROJO IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
PAGA SETTLEMENT**

Date: October 13, 2026
Time: 8:30 a.m.
Reservation ID: 714393221658

Judge: Michael Small
Dept.: 517

1 I, DEVONTE ROJO, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would
3 competently testify to the following facts from my own personal knowledge. I am the named
4 Plaintiff in the above PAGA action filed against FOREST LAWN MORTUARY and Defendant
5 FOREST LAWN MEMORIAL-PARK ASSOCIATION (collectively “Defendants”).

6 2. I am submitting this declaration in support of Plaintiff’s Motion to Approve PAGA
7 Settlement.

8 3. I seek to represent the State of California and a group of Aggrieved Employees
9 consisting of as all current and former non-exempt employees who worked for Defendants in
10 California during the period from February 1, 2022, through May 15, 2026 (“PAGA Period”). I
11 worked for Defendants as a non-exempt employee in California from January 2019 to February
12 2022. At all times during my employment, I was entitled to legally mandated meal and rest periods,
13 minimum wage and overtime compensation. During my employment, Defendants failed to, among
14 other things, properly calculate employees’ regular rate of pay, pay wages for all hours worked,
15 including minimum and reporting time wages, provide meal periods, provide rest periods, provide
16 accurate itemized wage statements, and reimburse for business expenses necessarily incurred.
17 Throughout my employment, I was subject to Defendants’ written policies and procedures contained
18 in, among other things, the “Serving with Forest Lawn” Employee Handbook.

19 4. I and the Aggrieved Employees, that I am seeking to represent, were subject to the
20 same alleged unlawful employment policies and practices at issue in this action, including but not
21 limited to, Defendants’ failure properly calculate employees’ regular rate of pay, pay wages for all
22 hours worked, including minimum wages, provide meal periods, provide rest periods, provide
23 accurate itemized wage statements, and reimburse for business expenses necessarily incurred.
24 Factually, Defendants’ policies and practices apply to me and all Aggrieved Employees, and
25 Defendants’ liability can be determined by facts common to all.

26 5. Further, there is no conflict between my interests and the interests of the Aggrieved
27 Employees that I am seeking to represent. My interests are entirely coextensive with the interests
28 of the Aggrieved Employees. I allege that I was injured by the same company-wide policies and

1 practices to which the Aggrieved Employees were subjected and seek the same relief. I have already
2 demonstrated my ability to advocate for the interests of the state and the Aggrieved Employees by
3 initiating this litigation, communicating with PAGA Counsel about the claims as they apply to
4 myself and others, undertaking extensive document evaluation and evaluating the proposed
5 settlement to assure that it is fair.

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

15 7. **Review and Approval of Settlement:** A mediation was held on August 18, 2025.
16 Even though I could not attend, I was available by telephone to speak with my attorneys and did
17 speak with them regarding the mediation before it took place, as well as during the mediation itself.
18 I was very satisfied with the terms of the settlement that was agreed to by the parties. I spoke with
19 my attorneys and reviewed the settlement agreement which I signed on March 3, 2026.

20 8. **Participation:** Since I retained Counsel approximately thirty-nine months ago, I
21 have been actively involved with this action lawsuit performing the duties described above. While
22 I did not keep formal time records, I was in regular contact with my attorneys, reviewed important
23 court filings, and spent considerable time on the issues presented during the litigation and in the
24 settlement process.

25 9. I believe that the proposed settlement before the court is fair, reasonable, and
26 adequate, and made in the best interest of the state and the Aggrieved Employees. I further support
27 the fees being requested by PAGA Counsel in this matter.

28 10. Ultimately, I believe I did the right thing in pursuing this case on behalf of the

1 Aggrieved Employees who now stand to receive substantial monetary payments as a result of this
2 case and settlement. Consequently, I respectfully, and humbly, ask the Court to grant approval of
3 the Settlement and all of its terms.

4
5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct. Executed on 09/08/2026 (Date), at Highland, (City), California.

7
8 
Devonte Rojo (Sep 8, 2026 15:56:37 PDT)
DEVONTE ROJO