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Attorneys for Plaintiff CARLOS MORENO

16 **UNITED STATES DISTRICT COURT**
 17 **CENTRAL DISTRICT OF CALIFORNIA**

CARLOS MORENO, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

PRETIUM PACKAGING, L.L.C, a Delaware limited liability company, and DOES 1 through 10, inclusive

Defendants

Case No. 8:19-cv-02500-SB-DFM

[Hon. Stanley Blumenfeld, Jr.]

**SUYAP MADRID'S
 DECLARATION IN SUPPORT OF
 PLAINTIFF'S MOTION FOR
 FINAL APPROVAL OF CLASS
 ACTION SETTLEMENT AND
 CLASS REPRESENTATIVE
 SERVICE PAYMENT AND
 MOTION FOR ATTORNEY'S
 FEES AND COSTS**

Date: August 6, 2021
 Time: 8:30 a.m.
 Courtroom: 6C

DECLARATION OF SUYAP MADRID

I, Suyap Madrid, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents. I also understand that this declaration may be used in support of Plaintiff’s Motion for Final Approval of Class Action Settlement and Class Representative Service Payment and Plaintiff’s Motion for Attorney’s Fees and Costs.

3. I am a former employee of Defendant Pretium Packaging, L.L.C. (“Pretium”) and Class Member in this action. I worked for Pretium from approximately 2012 to approximately 2017 as a Packer.

4. During my employment with Pretium, Pretium did not provide me with all legally required meal and rest breaks and I was not properly compensated for missed meal or rest breaks. Sometimes, I was not properly paid overtime when I worked more than eight hours per day or more than 40 hours per work week, and, sometimes, I was not properly paid double overtime when I worked more than 12 hours per day.

5. I fully support the class action settlement. The estimated amount I will receive from this settlement is \$2,838.10. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable.

6. I understand that the settlement agreement provides a service payment to Plaintiff Carlos Moreno in the amount of \$10,000. I believe this payment is fair

1 compensation for his time and effort on this case, and for the risk that he took in
2 helping me and my former co-workers. Without the efforts of Mr. Moreno, I do not
3 believe that I would have received compensation for my Labor Code claims against
4 Pretium.

5 7. I understand that Plaintiff’s Counsel seek attorney’s fees in the amount
6 of one-third of the \$1.6 million settlement (i.e., \$533,333.33). Although I did not
7 receive the initial mail about the class action settlement, the Plaintiff’s Counsel’s
8 office actively reached out to me by phone to inform me about the settlement.
9 Plaintiff’s Counsel also made sure to get my updated address so that I could receive
10 the Class Notice and ultimately receive the settlement payment. Plaintiff’s Counsel
11 also answered my questions regarding the settlement and payment. Plaintiff’s
12 Counsel have been thorough, diligent, prompt, courteous, and professional, and I
13 believe that they are fully entitled to the award of fees that they have requested for
14 their hard work. I do not believe that I would not have received the compensation
15 for my Labor Code claims against Pretium without Plaintiff’s Counsel’s hard work
16 and diligent efforts.

17 I declare under penalty of perjury under the laws of the State of California
18 and the United States that the foregoing is true and correct.

19 Executed on 7/6/2021, in S.M.G, California.

DocuSigned by:
Suyap Madrid
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Suyap Madrid