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Attorneys for Plaintiff OMAR VEJAR

SUPERIOR COURT OF THE STATE OF CALIFORNIA**IN AND FOR THE COUNTY OF ORANGE**OMAR VEJAR, on behalf of himself and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

FINELINE WOODWORKING, INC., a
California Corporation, FINELINE
ARCHITECTURAL MILLWORK, INC., a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No: 30-2021-01208607-CU-OE-CXC

**DECLARATION OF OMAR VEJAR IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Dept.: CX105

Judge: Randall J. Sherman

Date: April 15, 2022

Time: 10:00 A.M.

Reservation ID: 73712866

1 I, OMAR VEJAR, declare as follows:

2 1. I am over the age of eighteen, and the Plaintiff and Proposed Class Representative
3 in the above-entitled matter. I submit this declaration in support of Plaintiff's Motion for
4 Preliminary Approval of Class Action Settlement and in support of my application for the requested
5 Service Payment. I have personal knowledge of all the facts stated herein. I could and would
6 competently testify under oath to these facts in court if requested to do so.

7 2. On June 29, 2021, I filed a class action lawsuit in the Orange County Superior Court.
8 My case was filed on behalf of myself all employees who are or previously were employed by
9 defendant Fineline Woodworking, Inc. or Fineline Architectural Millwork, Inc. ("Defendants") in
10 California and who were classified as non-exempt employees during the Class Period. The Class
11 Period means the period between June 29, 2017 to March 26, 2022. I worked for Defendants
12 between September 2019 and July 2020 in California.

13 3. I believe that I am, have been and will continue to represent the interests of the
14 class fairly and adequately I am seeking to represent. Further, I believe that I have claims that
15 are typical of the claims the Class Members that I am seeking to represent. Specifically, like the
16 Class I am seeking to represent, I was employed by Defendants as a non-exempt employee during
17 the Class Period. Consequently, I am a member of the Class that I am seeking to represent.

18 4. Additionally, my claims are typical of the claims of the Class Members that I am
19 seeking to represent because I was subject to the same alleged unlawful employment policies and
20 practices at issue in this action, including but not limited to, Defendants' failure to provide
21 complaint meal and rest periods, failure to pay for all hours worked, and failure to reimburse
22 mandatory business expenses. Factually, Defendants' policies and practices apply class wide, and
23 Defendants' liability can be determined by facts common to all Class Members.

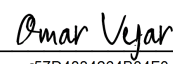
24 5. Further, there is no conflict between my interests and the interests of the class that
25 I am seeking to represent. My interests are entirely coextensive with the interests of the Class
26 Members. Plaintiff alleges that they were injured by the same company-wide practices to which
27 the proposed Class was subject and seeks the same relief. I have already demonstrated my ability
28

1 to advocate for the interests of the Class Members by initiating this litigation, providing
2 documents to Class Counsel, participating in the investigation and negotiations in the Action, and
3 evaluating the proposed settlement to assure that it is fair.

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

14 7. I believe that the proposed settlement before the Court is fair, reasonable, and
15 adequate, and made in the best interest of the Class Members. Consequently, I respectfully, and
16 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct. Executed on 3/3/2022 at 9:00pm.

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20
21 By: 
22 OMAR VEJAR
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DocuSigned by:

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