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Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

NICOLA ROMANO, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

SSA TERMINALS, LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

DEFENDANTS.

Case No.: 20STCV29048

[Assigned for all purposes to the Hon. William F.
Highberger, Department 10]

**DECLARATION OF NICOLA ROMANO IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 22, 2022

Time: 11:00 a.m.

Dept.: 10

Complaint Filed: July 30, 2020

Trial Date: None Set

DECLARATION OF NICOLA ROMANO

I, Nicola Romano, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant SSA Terminals, LLC ("Defendant") as a Crane Mechanic from about August 2018, until about March 14, 2020. I worked as a non-exempt, hourly employee.

3. During my employment, the wage statements I received from Defendant did not accurately identify the total hours worked. Instead, the total listed on my wage statements was less than the actual total number of hours worked.

4. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Settlement Class. As the Class Representative, I understand that it is my responsibility to act in the best interests of the Settlement Class and not my own. I agree that I will not put my own interests ahead of that of the Settlement Class, and that I will not settle out my class and PAGA claims as alleged in the Complaint separately or independently from the Settlement Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Settlement Class that would impair or affect my ability to serve as representative for the Settlement Class.

5. I have and continue to be willing to assist in the investigation of this matter, including meeting and discussing the case with my attorneys, providing any necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Settlement Class. I also understand my duties and responsibilities to the proposed Settlement Class and will carry out those duties as necessary.

6. I have reviewed the Settlement Agreement and discussed its terms with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Settlement Class.

7. I am proud of the result and accomplishment of this lawsuit. I feel that it is a

1 positive accomplishment and understand that other people will benefit because of the actions that
2 I have taken. I believe that the class settlement is fair, adequate, and reasonable.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.

5 Executed on this ²⁸ day of March 2022, at fullerton, California.

DocuSigned by:

Nicola Romano

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Nicola Romano