

Electronically FILED by Superior Court of California, County of Los Angeles on 10/18/2022 11:30 AM Sherri R. Carter, Executive Officer/Clerk of Court, by K. Valenzuela, Deputy Clerk

Larry W. Lee (State Bar No. 228175)
 Kristen M. Agnew (State Bar No. 247656)
 Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
 515 S. Figueroa Street, Suite 1250
 Los Angeles, CA 90071
 (213) 488-6555
 (213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
Polaris Law Group
 501 San Benito Street, Suite 200
 Hollister, CA 95023
 (831) 531-4214
 (831) 634-0333 facsimile

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
 FINAL APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: November 9, 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. Prior to and subsequent to the filing of this lawsuit, I met with and regularly conferred with my attorneys to discuss the status of the case, provide information and documents to my attorneys, and assist my attorneys in gathering evidence to support the class claims.

5. Throughout this case, I have been kept apprised of the status of this case.

6. I understand that this action was brought on behalf of other similarly situated employees of Defendant in the State of California, and thus 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 Settlement Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Settlement Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Settlement Class that would impair or affect my ability to serve as representative for the Settlement Class.

7. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Settlement Class. I have actively participated in this litigation in numerous ways: I have communicated with my attorneys regularly both to keep apprised of the status as well as provide them with information. I have searched for and provided documents needed by my attorneys. I have reviewed case documents. I have provided declarations as

1 needed. In total, I have spent approximately 45 hours in the prosecution of this case.

2 8. I have discussed the terms of the settlement with my attorneys, and based on the
3 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and
4 for the Settlement Class.

5 9. I am aware and have been aware from the inception of the case, that there is the
6 risk that if I do not win my case, then I could be liable for Defendant's litigation fees and costs. I
7 also understand that filing a case on my own behalf could have involved fewer costs and
8 resolved faster than filing a class action. I accepted that risk in this case.

9 10. I also understood that filing this lawsuit is a public record and I accepted that
10 burden. As such, I risked my future employment in order to bring this action. Moreover, this
11 lawsuit, which is a public record, is something that potential employers can look into, and which
12 may cause a negative impact of my employment prospects.

13 11. I understand that because of my actions, many others have benefited by this case.
14 I feel that I took upon myself the risk of this lawsuit and achieved a result for my other former
15 co-workers who did not have to file suit.

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

18 Executed on this 17 day of October 2022, at Fullerton, California.

19 DocuSigned by:
20 Nicola Romano
21 51917A88B2991467
22 Nicola Romano
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