

HEATHER DAVIS, SBN 239372
heather@protectionlawgroup.com
AMIR NAYEBDADASH, SBN 232204
amir@protectionlawgroup.com
PROTECTION LAW GROUP, LLP
237 California Street
El Segundo, California 90245
Telephone: (424) 290-3095
Facsimile: (866) 264-7880

Attorneys for Plaintiff
STEVE VALENZUELA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

STEVE VALENZUELA, individually and on
behalf of others similarly situated,

Plaintiff,

vs.

AXIOM MATERIALS, INC., a California
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 30-2020-01140945-CU-OE-CXC

Hon. Peter Wilson
Dept. CX101

**SUPPLEMENTAL DECLARATION OF
STEVE VALENZUELA IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Filed date: May 26, 2020
Trial date: None

SUPPLEMENTAL DECLARATION OF STEVE VALENZUELA

I, Steve Valenzuela, respectfully declare as follows:

1. I am over 18 years of age and a resident of California. I am the Plaintiff in this action entitled *Steve Valenzuela v. Axiom Materials, Inc.*, Orange County Superior Court Case No. 30-2020-01140945-CU-OE-CXC. I have personal knowledge of the following. If called as a witness, based on my personal knowledge as well as my review of relevant documents in this matter, I could and would competently testify thereto.

2. I estimate I have spent approximately a total of 13 hours on this matter (multiple calls with my attorneys, being available to my attorneys whenever they needed me, searching for relevant documents, reviewing and providing suggested revisions to discovery responses, reviewing the signing the settlement, and similar related tasks). I am estimated to receive a gross Class payment and gross PAGA payment of \$0.00 as, as I did not work during the Class Period. But, due to my lengthy workers' compensation leave, I believe that I am still a Class Member because of my claims related to my final paycheck, which was issued in 2019.

3. I believe that I have done everything that my attorneys have asked of me. I think my efforts as a representative helped to achieve the result obtained in this case. Accordingly, I respectfully request that the Court award me a service award in the amount of \$5,000.00 for my active participation in this case, the risks I took in order to recover on behalf of not just myself but others, and the general release I have entered on my own behalf I believe that this amount is reasonable.

4. I am not related to anyone associated with Protection Law Group, LLP.

5. I have not entered into any undisclosed settlement agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment.

6. I am also aware of, and have consented to in writing, the fee splitting agreement between Protection Law Group, LLP, Aegis Law Firm, PC, and Melmed Law Group P.C., which provides 40% to Protection Law Group, LLP, 40% to Aegis Law Firm, PC, and 20% to Melmed Law Group P.C.

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

1/26/2023

Executed on January __, 2023, at Santa Ana, California.

DocuSigned by:

Steve Valenzuela

74CB82074FDB441...

STEVE VALENZUELA