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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ADRIAN VIDES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CELOSEAL ROOFING, INC., a California
Corporation; and DOES 1 through 100,

Defendants.

CASE NO. 30-2020-01162478-CU-OE-CXC

*[Case assigned for all purposes to the Hon.
Randall J. Sherman]*

**DECLARATION OF ADRIAN VIDES IN
SUPPORT OF APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 14, 2021
Time: 9:00 a.m.
Dept.: CX105

Action Filed: September 28, 2020
Trial Date: None Set

DECLARATION OF ADRIAN VIDES

I, Adrian Vides, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant Celoseal Roofing, Inc. ("Celoseal") in California from approximately 1999 to April 3, 2020. During my employment, Celoseal automatically deducted about 45 minutes from my time worked for a meal period, even when I was not actually provided with a meal period. Celoseal tracked my daily hours using both handwritten time cards and a phone app. My understanding is that the app recorded my time to the minute but Celoseal still rounded my hours against me. Celoseal did not pay me any money for cell phone reimbursements even though I used the phone app to record my time. As I said above, sometimes I would not receive a full 45 minutes for my meal period or, on other occasions, I would not be provided a meal period until after 5 hours of work. When I worked over 10 hours, I did not receive a second meal period. I also had to drive my own vehicle to and from different job sites but Celoseal did not reimburse me for any expenses related to my vehicle. Because of these issues, I believe Celoseal did not issue me accurate wage statements or pay me all wages I was owed when I left. The wage statements I received also did not have Celoseal's street address on them.

3. I started this lawsuit against Celoseal because I wanted Celoseal to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other Celoseal employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of Celoseal's other workers.

4. I have been actively involved in this case since before it was filed. Some of the tasks I have performed include, gathering relevant documents for use in the lawsuit, providing factual information regarding the claims and Celoseal's practices to my attorneys, and helping

1 identify other employees who also experienced the same issues that I did. I estimate that I have
2 spent at least 15 total hours on these activities.

3 I declare under penalty of perjury under the laws of the state of California and the United
4 States that the foregoing is true and correct. Executed on May 20, 2021, in Santa Ana,
5 California.

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