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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO**

EDUARDO GONZALEZ, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

GUARDIAN INDUSTRIES, LLC, a
Delaware corporation; and DOES 1 through
100,

Defendants.

Case No. 19CECG02134

*[Case assigned to the Hon. Rosemary McGuire,
Dept. 402]*

**DECLARATION OF EDUARDO
GONZALEZ IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

Action Filed: June 20, 2019

DECLARATION OF EDUARDO GONZALEZ

I, Eduardo Gonzalez, 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 understand my obligations as the class representative, and I do not have any conflicts that would prevent me from adequately representing the class.

3. I worked for Guardian Industries LLC ("Guardian") as a non-exempt lower line operator in California from approximately August 2016 until approximately July 2020.

4. I have reviewed the wage statements that Guardian provided to my attorneys during this litigation. I confirm that the wage statements attached to my declaration as Exhibit 1 are true and accurate copies of wage statements that I received during my employment.

5. During my employment, my supervisors required me to change into my safety equipment before clocking in to work. At the end of my shift I was required to take off my safety equipment in the locker room after I clocked out. I do not believe I was paid for this time.

6. Even though I regularly worked shifts over 10 hours, I was not provided with a second meal period on those shifts. There were also many shifts that I was not provided a full 30 minutes for a meal period because my coworkers and I were too busy trying to finish required tasks during the day.

7. I brought this lawsuit against Guardian because I wanted Guardian to comply with the law and treat its employees fairly. I did this fully knowing that my name would be attached to the lawsuit and that any future employers could potentially see the lawsuit if they searched. I accepted that burden for the benefit of my coworkers.

8. I have been actively involved in this case since before it was filed. Among other things, I gathered relevant documents for use in the lawsuit, provided factual information and had multiple discussions with my attorneys regarding the claims at issue and Guardian's policies and

1 practices. I also helped my attorneys identify other employees who also experienced the same
2 issues that I did. I estimate that I have spent at least 15 hours in total 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 Jan 14, 2021, in Cutler,
5 California.

6 

Eduardo Gonzalez (San Jose, CA 95128)

7 Eduardo Gonzalez

CERIDIAN

Employer Name: Guardian Industries Corp.
Employer Phone: (248) 340-1800
Employer Address: 2300 Harmon Road
 Auburn Hills, MI 48326

Employee Name: Eduardo M Gonzalez
Employee #: 201603249
Employee Address: 1071 N. Bates Ave Apt. C
 Dinuba, CA 93618
Department: LOWER LINE SHIFT A
Job Title: OPERATOR

Dayforce
Pay Date: 12/30/2016
Pay Period: 12/18/2016 - 12/24/2016
Deposit Advice #: 153111491
Pay Frequency: Weekly
Federal Filing Status: Single; Exempt
Federal Exemptions: 0/\$0.00
State Filing Status: Single; Alt Code 01 (CA)
State Exemptions: 1 (CA)

	Current 12/18/2016 - 12/24/2016			YTD As of 12/24/2016	
	Hours/Units	Rate	Amount	Hours/Units	Amount
Earnings	75.48		\$ 1,203.68	1,099.48	\$ 17,572.74
Regular	32.00	13.7800	\$ 440.96	643.47	\$ 8,866.97
Overtime	23.73	20.6700	\$ 490.57	351.03	\$ 7,255.89
Double Time				0.23	\$ 6.43
Missed Meal				1.00	\$ 13.78
Vacation Amount				60.00	\$ 826.80
Holiday	8.00	13.7800	\$ 110.24	32.00	\$ 440.96
Sick Pay	11.75	13.7800	\$ 161.91	11.75	\$ 161.91
Memo Information					
401K ER Match					\$ 63.20
Pre-Tax Deductions			\$ 6.94		\$ 111.78
Vision			\$ 1.84		\$ 12.88
Medical/Rx			\$ 3.60		\$ 25.20
Dental			\$ 1.50		\$ 10.50
401(k)					\$ 63.20
Taxes			\$ 161.11		\$ 3,585.82
Fed W/H					\$ 1,451.71
FICA EE			\$ 74.20		\$ 1,086.50
Fed MWT EE			\$ 17.35		\$ 254.10
CA W/H			\$ 58.78		\$ 635.79
CA DT EE			\$ 10.78		\$ 157.72
Post-Tax Deductions			\$ 37.15		\$ 665.19
FOC 90-01			\$ 34.61		\$ 588.37
LTD H			\$ 2.54		\$ 40.82
Jackets					\$ 36.00
Reimbursements					\$ 75.00
Reimbursement					\$ 75.00
	Routing #	Account #	Amount		Amount
Net Pay			\$ 998.48		\$ 13,284.95
Payroll Card	064206594	XXXXX9884	\$ 998.48		

Accruals & Balances

Floating/Bank Holiday	8.00 Hours		
Hours Balance:			
Sick-Hours Balance:	23.50 Hours	Sick-Hours Taken:	11.75 Hours

CERIDIAN

Employer Name: Guardian Industries Corp.
Employer Phone: (248) 340-1800
Employer Address: 2300 Harmon Road
 Auburn Hills, MI 48326

Employee Name: Eduardo M Gonzalez
Employee #: 201603249
Employee Address: 1071 N. Bates Ave Apt. C
 Dinuba, CA 93618
Department: LOWER LINE SHIFT A
Job Title: OPERATOR

Pay Date: 2/17/2017
Pay Period: 2/5/2017 - 2/11/2017
Deposit Advice #: 157065983
Pay Frequency: Weekly
Federal Filing Status: Single
Federal Exemptions: 1/\$0.00
State Filing Status: Single; Alt Code 01 (CA)
State Exemptions: 1 (CA)

	Current 2/5/2017 - 2/11/2017			YTD As of 2/11/2017	
	Hours/Units	Rate	Amount	Hours/Units	Amount
Earnings	68.45		\$ 1,139.26	490.88	\$ 7,952.20
Regular	40.00	13.7800	\$ 551.20	258.98	\$ 3,568.79
Overtime	28.45	20.6700	\$ 588.06	172.39	\$ 3,563.50
Holiday				32.00	\$ 440.96
Sick Pay				19.50	\$ 268.71
Float Holiday				8.00	\$ 110.24
Pre-Tax Deductions			\$ 6.89		\$ 48.23
Vision			\$ 1.84		\$ 12.88
Medical/Rx			\$ 3.55		\$ 24.85
Dental			\$ 1.50		\$ 10.50
Taxes			\$ 318.32		\$ 1,927.63
Fed W/H			\$ 170.62		\$ 890.70
FICA EE			\$ 70.21		\$ 490.05
Fed MWT EE			\$ 16.42		\$ 114.61
CA W/H			\$ 50.87		\$ 361.13
CA DT EE			\$ 10.20		\$ 71.14
Post-Tax Deductions			\$ 49.08		\$ 286.48
FOC 90-01			\$ 34.61		\$ 242.27
LTD H			\$ 2.47		\$ 20.21
Jackets			\$ 12.00		\$ 24.00
	Routing #	Account #	Amount		Amount
Net Pay			\$ 764.97		\$ 5,689.86
Payroll Card	064206594	XXXXX9884	\$ 764.97		

Accruals & Balances

Floating/Bank Holiday 8.00 Hours
 Hours Balance:
 Sick-Hours Balance: 35.25 Hours
 Vacation (Hours) 8.00 Hours
 Balance:



CERIDIAN

CERIDIAN

Employer Name: Guardian Industries Corp.
Employer Phone: (248) 340-1800
Employer Address: 2300 Harmon Road
 Auburn Hills, MI 48326

Dayforce
Employee Name: Eduardo M Gonzalez
Employee #: 201603249
Employee Address: 1071 N. Bates Ave Apt. C
 Dinuba, CA 93618
Department: LOWER LINE SHIFT A
Job Title: OPERATOR

Pay Date: 2/24/2017
Pay Period: 2/12/2017 - 2/18/2017
Deposit Advice #: 157644269
Pay Frequency: Weekly
Federal Filing Status: Single
Federal Exemptions: 1/\$0.00
State Filing Status: Single; Alt Code 01 (CA)
State Exemptions: 1 (CA)

	Current 2/12/2017 - 2/18/2017			YTD As of 2/18/2017	
	Hours/Units	Rate	Amount	Hours/Units	Amount
Earnings	64.70		\$ 1,061.75	555.58	\$ 9,013.95
Regular	40.00	13.7800	\$ 551.20	298.98	\$ 4,119.99
Overtime	24.70	20.6700	\$ 510.55	197.09	\$ 4,074.05
Holiday				32.00	\$ 440.96
Sick Pay				19.50	\$ 268.71
Float Holiday				8.00	\$ 110.24
Pre-Tax Deductions			\$ 6.89		\$ 55.12
Vision			\$ 1.84		\$ 14.72
Medical/Rx			\$ 3.55		\$ 28.40
Dental			\$ 1.50		\$ 12.00
Taxes			\$ 284.88		\$ 2,212.51
Fed W/H			\$ 151.24		\$ 1,041.94
FICA EE			\$ 65.40		\$ 555.45
Fed MWT EE			\$ 15.29		\$ 129.90
CA W/H			\$ 43.46		\$ 404.59
CA DT EE			\$ 9.49		\$ 80.63
Post-Tax Deductions			\$ 37.15		\$ 323.63
FOC 90-01			\$ 34.61		\$ 276.88
LTD H			\$ 2.54		\$ 22.75
Jackets					\$ 24.00
	Routing #	Account #	Amount		Amount
Net Pay			\$ 732.83		\$ 6,422.69
Payroll Card	064206594	XXXXX9884	\$ 732.83		

Accruals & Balances

Floating/Bank Holiday	8.00 Hours
Hours Balance:	
Sick-Hours Balance:	35.25 Hours
Vacation (Hours)	8.00 Hours
Balance:	

CERIDIAN

Employer Name: Guardian Industries Corp.
Employer Phone: (248) 340-1800
Employer Address: 2300 Harmon Road
 Auburn Hills, MI 48326

Employee Name: Dayforce
 Eduardo M Gonzalez
Employee #: 201603249
Employee Address: 1071 N. Bates Ave Apt. C
 Dinuba, CA 93618
Department: LOWER LINE SHIFT A
Job Title: OPERATOR

Pay Date: 8/18/2017
Pay Period: 8/6/2017 - 8/12/2017
Deposit Advice #: 173101141
Pay Frequency: Weekly
Federal Filing: Single; Exempt
Status: 0/\$0.00
Federal Exemptions:
State Filing: Single; Exempt; Alt Code 01
Status: (CA)
State Exemptions: 1 (CA)

	Current 8/6/2017 - 8/12/2017			YTD As of 8/12/2017	
	Hours/Units	Rate	Amount	Hours/Units	Amount
Earnings	47.00		\$ 751.01	1,708.49	\$ 27,348.26
Regular	32.00	13.7800	\$ 440.96	1,042.23	\$ 14,361.98
Overtime	15.00	20.6700	\$ 310.05	552.26	\$ 11,415.35
Holiday				56.00	\$ 771.68
Sick Pay				50.00	\$ 689.01
Float Holiday				8.00	\$ 110.24
Memo Information					
401K ER Match			\$ 7.51		\$ 13.00
Pre-Tax Deductions			\$ 14.40		\$ 240.37
Vision			\$ 1.84		\$ 60.72
Medical/Rx			\$ 3.55		\$ 117.15
Dental			\$ 1.50		\$ 49.50
401(k)			\$ 7.51		\$ 13.00
Taxes			\$ 63.63		\$ 4,049.66
Fed W/H					\$ 1,152.10
FICA EE			\$ 46.14		\$ 1,681.50
Fed MWT EE			\$ 10.79		\$ 393.25
CA W/H					\$ 578.72
CA DT EE			\$ 6.70		\$ 244.09
Post-Tax Deductions			\$ 36.26		\$ 1,327.08
FOC 90-01			\$ 34.61		\$ 1,142.13
LTD H			\$ 1.65		\$ 73.86
Shoes					\$ 75.09
Jackets					\$ 36.00
	Routing #	Account #	Amount		Amount
Net Pay			\$ 636.72		\$ 21,731.15
Payroll Card	064206594	XXXXX9884	\$ 636.72		

Accruals & Balances

Floating/Bank Holiday 8.00 Hours
 Hours Balance:
 Sick-Hours Balance: 4.75 Hours
 Vacation (Hours) 8.00 Hours
 Balance:



CERIDIAN

CERIDIAN

Employer Name: Guardian Industries Corp.
Employer Phone: (248) 340-1800
Employer Address: 2300 Harmon Road
 Auburn Hills, MI 48326

Employee Name: Dayforce
 Eduardo M Gonzalez
Employee #: 201603249
Employee Address: 1071 N. Bates Ave Apt. C
 Dinuba, CA 93618
Department: LOWER LINE SHIFT A
Job Title: OPERATOR

Pay Date: 8/25/2017
Pay Period: 8/13/2017 - 8/19/2017
Deposit Advice #: 173754669
Pay Frequency: Weekly
Federal Filing Status: Single; Exempt
Federal Exemptions: 0/\$0.00
State Filing Status: Single; Exempt; Alt Code 01 (CA)
State Exemptions: 1 (CA)

	Current 8/13/2017 - 8/19/2017			YTD As of 8/19/2017	
	Hours/Units	Rate	Amount	Hours/Units	Amount
Earnings	35.25		\$ 634.38	1,743.74	\$ 27,982.64
Regular	24.00	15.5200	\$ 372.48	1,066.23	\$ 14,734.46
Overtime	11.25	23.2800	\$ 261.90	563.51	\$ 11,677.25
Holiday				56.00	\$ 771.68
Sick Pay				50.00	\$ 689.01
Float Holiday				8.00	\$ 110.24
Memo Information					
401K ER Match			\$ 6.34		\$ 19.34
Pre-Tax Deductions			\$ 13.23		\$ 253.60
Vision			\$ 1.84		\$ 62.56
Medical/Rx			\$ 3.55		\$ 120.70
Dental			\$ 1.50		\$ 51.00
401(k)			\$ 6.34		\$ 19.34
Taxes			\$ 53.64		\$ 4,103.30
Fed W/H					\$ 1,152.10
FICA EE			\$ 38.90		\$ 1,720.40
Fed MWT EE			\$ 9.10		\$ 402.35
CA W/H					\$ 578.72
CA DT EE			\$ 5.64		\$ 249.73
Post-Tax Deductions			\$ 36.64		\$ 1,363.72
FOC 90-01			\$ 34.61		\$ 1,176.74
LTD H			\$ 2.03		\$ 75.89
Shoes					\$ 75.09
Jackets					\$ 36.00
	Routing #	Account #	Amount		Amount
Net Pay			\$ 530.87		\$ 22,262.02
Payroll Card	064206594	XXXXX9884	\$ 530.87		

Accruals & Balances

Floating/Bank Holiday 8.00 Hours
 Hours Balance:
 Sick-Hours Balance: 4.75 Hours
 Vacation (Hours) 8.00 Hours
 Balance:

CERIDIAN

Employer Name: Guardian Industries Corp.
Employer Phone: (248) 340-1800
Employer Address: 2300 Harmon Road
 Auburn Hills, MI 48326

Employee Name: Eduardo M Gonzalez
Employee #: 201603249
Employee Address: 1071 N. Bates Ave Apt. C
 Dinuba, CA 93618
Department: LOWER LINE SHIFT A
Job Title: OPERATOR

Pay Date: 9/1/2017
Pay Period: 8/20/2017 - 8/26/2017
Deposit Advice #: 174445438
Pay Frequency: Weekly
Federal Filing: Single; Exempt
Status: 0/\$0.00
Federal Exemptions:
State Filing: Single; Exempt; Alt Code 01 (CA)
Status: (CA)
State Exemptions: 1 (CA)

	Current 8/20/2017 - 8/26/2017			YTD As of 8/26/2017	
	Hours/Units	Rate	Amount	Hours/Units	Amount
Earnings	46.75		\$ 840.02	1,790.49	\$ 28,822.66
Regular	32.00	15.5200	\$ 496.64	1,098.23	\$ 15,231.10
Overtime	14.75	23.2800	\$ 343.38	578.26	\$ 12,020.63
Holiday				56.00	\$ 771.68
Sick Pay				50.00	\$ 689.01
Float Holiday				8.00	\$ 110.24
Memo Information					
401K ER Match			\$ 8.40		\$ 27.74
Pre-Tax Deductions			\$ 15.29		\$ 268.89
Vision			\$ 1.84		\$ 64.40
Medical/Rx			\$ 3.55		\$ 124.25
Dental			\$ 1.50		\$ 52.50
401(k)			\$ 8.40		\$ 27.74
Taxes			\$ 71.23		\$ 4,174.53
Fed W/H					\$ 1,152.10
FICA EE			\$ 51.65		\$ 1,772.05
Fed MWT EE			\$ 12.08		\$ 414.43
CA W/H					\$ 578.72
CA DT EE			\$ 7.50		\$ 257.23
Post-Tax Deductions			\$ 36.32		\$ 1,400.04
FOC 90-01			\$ 34.61		\$ 1,211.35
LTD H			\$ 1.71		\$ 77.60
Shoes					\$ 75.09
Jackets					\$ 36.00
	Routing #	Account #	Amount		Amount
Net Pay			\$ 717.18		\$ 22,979.20
Payroll Card	064206594	XXXXX9884	\$ 717.18		

Accruals & Balances

Floating/Bank Holiday	8.00 Hours
Hours Balance:	
Sick-Hours Balance:	4.75 Hours
Vacation (Hours)	8.00 Hours
Balance:	