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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

ANGEL GARCIA, individually, and on behalf of
other members of the public similarly situated;

Plaintiff,

vs.

J&B INVESTMENTS, INC. dba J&B
MATERIALS, INC., a California corporation;
PACIFIC GYPSUM SUPPLY, INC., a Georgia
Corporation; GYPSUM MANAGEMENT AND
SUPPLY, INC., a Georgia Corporation; and
DOES 1 through 25, inclusive.

Defendants.

Case No.: CIVSB2208601

CLASS ACTION

*[Assigned for all purposes to the Hon. Joseph
T. Ortiz, Dept. S17]*

**DECLARATION OF EDUARDO LOPEZ
LOPEZ IN SUPPORT MOTION FOR
FINAL APPROVAL OF CLASS ACTION**

Hearing Information:

Date: August 16, 2023
Time: 1:30 p.m.
Dept: S-17

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Attorneys for Plaintiff Michael Woods

DECLARATION OF CHRISTIAN HERNANDEZ

I, Christian Hernandez, declare,

1. I am over the age of 18 and am one of the named Plaintiffs and class representatives in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. I worked for Defendant from approximately August 15, 2015, through approximately April 5, 2021, as a non-exempt hourly paid employee.

3. I understand this is a class action lawsuit where I represent the interests of all current and former non-exempt, hourly employees of Defendant who were directly hired and employed by P&G and worked at the P&G and worked at the P&G Facility in Moreno Valley, California at any time during the Class Period.

4. I have actively participated in this lawsuit by searching for an attorney since approximately March 2021, meeting with my attorneys in this case for evaluation of my case, to retain them, and to discuss policies and practices of Defendants. I also spent time searching for policies and other documents that were given to me during my employment. I responded to all of my attorneys' telephone inquiries and met with them to provide information about my employment and my experiences and my understanding about the operations of Defendants. During the mediation sessions, I made myself available and provided any information needed from me. Once the settlement agreement was finalized, I spent time reviewing and discussing the settlement agreement with my attorneys before signing it. Since I first began searching for attorneys regarding my employment with Defendants, I estimate that I have spent approximately 24 hours on this lawsuit which includes time spent searching for attorneys, searching for documents and policies to help the lawsuit, providing those documents and information to my attorneys, responding to my attorneys telephone calls and requests to meet them to provide them with more information about different aspects of my employment and experiences, speaking with my attorneys to evaluate my case and to provide information and sign documents, making myself available during the mediation sessions, reviewing the settlement agreement, and reviewing and providing information for this declaration.

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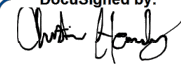
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C.H.

DECLARATION OF CHRISTIAN HERNANDEZ

1 5. I also understand that if there was a trial, I would need to be present at trial and follow
2 any other request from the court. I have tried to support the case by responding to my attorneys when
3 I was needed and providing them with any requested information. I will continue to respond to any
4 requests from my attorneys or the court. I know that I took a risk by filing this lawsuit because if I
5 lost I would have been responsible for the costs of the case. I also would have lost income if I had
6 to take work time off to come to trial or any other hearings. I also knew future employers may learn
7 of the lawsuit and view me negatively because I hired an attorney and sued my employer when I
8 thought my rights were violated.

9
10 I declare under penalty of perjury, under the laws of State of California, that the foregoing is
11 true and correct.

12 Dated: August 24, 2023

DocuSigned by:

139738AE264A483...

Christian Hernandez