

DIVERSITY LAW GROUP, P.C.

Larry W. Lee (State Bar No. 228175)

lwlee@diversitylaw.com

Simon L. Yang (State Bar No. 260286)

sly@diversitylaw.com

515 South Figueroa Street, Suite 1250

Los Angeles, California 90071

Telephone: (213) 488-6555

Facsimile: (213) 488-6554

POLARIS LAW GROUP

William L. Marder (State Bar No. 170131)

bill@polarislawgroup.com

501 San Benito Street, Suite 200

Hollister, California 95023

Telephone: (831) 531-4214

Facsimile: (831) 634-0333

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA**FOR THE COUNTY OF SANTA BARBARA**

DAVID ANDRADE, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiffs,

vs.

GENERAL DYNAMICS MISSION SYSTEMS,
INC., a Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 20CV03134

[Hon. Thomas P. Anderle]

**DECLARATION OF DAVID ANDRADE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

*[Filed concurrently with Notice of Motion and
Motion for Preliminary Approval of Class Action
Settlement; Memorandum of Points and
Authorities; Declaration of Larry W. Lee;
Declaration of Simon L. Yang; Declaration of
William L. Marder; [Proposed] Order]*

Date: September 14, 2021

Time: 10:00 a.m.

Department: 3

Complaint Filed: September 28, 2020

DECLARATION OF DAVID ANDRADE

I, David Andrade, 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, except as to those matters stated on information and belief and, as to those matters, I believe them to be true. If called as a witness, I could testify competently as to the matters stated in this declaration.

2. I am employed by General Dynamics Mission Systems, Inc. as a field systems engineer. I have worked for the company for over 20 years. The wage statements that I have been provided do not show all applicable hourly rates I earn or the corresponding number of hours I work at each hourly rate. The wage statements that I have been provided also do not show the name of the legal entity that is the employer.

3. I do not believe I have any interests that are adverse to the interests of the Class. I also am unaware of any such issues having been raised or presented by anyone else. I have taken all necessary steps to represent the interests of the Class, including by providing information and documents to my counsel, making myself available to discuss the claims, providing additional wage statements that I have been issued while the lawsuit was pending, and answering any questions that have come up.

4. Especially as a current employee when filing the lawsuit, I am proud of the result and accomplishment of this lawsuit. I believe many employees would not sue their employer out of fear, but I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken. I believe that the class settlement is fair, adequate, and reasonable.

5. I understand that the attorneys' fees awarded in this action will be split 65% to Diversity Law Group, P.C. and 35% to Polaris Law Group.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 18th day of August 2021, at Santa Maria, California.

DocuSigned by:

David Andrade

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