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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – POMONA COURTHOUSE**

PORFIRIO LANDEROS, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General Act;

Plaintiff,

vs.

ALLFAST FASTENING SYSTEM, an
unknown business entity; TRIMAS
CORPORATION, an unknown business entity,
and DOES 1 through 100, inclusive,

Defendants.

Case No. 20PSCV00807

Honorable Peter A. Hernandez
Department O

**DECLARATION OF PORFIRIO
LANDEROS IN SUPPORT OF
PLAINTIFF’S MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LAB. CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS’ FEE
AMOUNT, LITIGATION COST
AMOUNT, ENHANCEMENT AWARD,
AND SETTLEMENT
ADMINISTRATION FEE**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys’ Fee Amount,
Litigation Cost Amount, Enhancement
Award, and Settlement Administration Fee;
Declaration of Proposed Class Counsel
(Annabel Blanchard); and [Proposed] Order
filed concurrently herewith]

Reservation ID: 28439067627
Date: March 9, 2023
Time: 9:30 a.m.
Department: O

Complaint Filed: November 18, 2020
Trial Date: None Set

DECLARATION OF PORFIRIO LANDEROS

I, **Porfirio Landeros**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendants Allfast Fastening System and Trimas Corporation (“Allfast”) as an hourly-paid Operator from approximately June 2019 to approximately October 2019. I decided to seek legal advice about my work experiences with Allfast. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Allfast was held accountable for not paying its aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **5 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **6 hours** discussing my situation, representative action under the Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action.

3. I have spent over **10 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Allfast, reviewing documents with my attorneys and answering their questions, and providing guidance regarding the duties of hourly paid employees, and helping develop a strategy as to what documents and information to obtain from Allfast. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the matter progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **8 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Allfast. During the

1 discovery phase of the litigation, I spent approximately **14 additional hours** reviewing
2 Defendants' discovery requests, locating documents, and providing documents and responses to
3 my attorneys.

4 5. As far as the settlement is concerned, I spent about **2 hours** reviewing the
5 settlement agreement and about **3 hours** asking questions and discussing the potential settlement
6 with my attorneys before signing the settlement agreement.

7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
9 California. I think my efforts helped to get the result obtained in this case, and as a PAGA
10 representative, I respectfully request that the Court award me an Enhancement Award in the
11 amount of \$7,500.00 for my active participation in this case. Taking into consideration the time
12 that I have dedicated to this case, I believe that this amount is reasonable.

13 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

14 8. I have not entered into any undisclosed agreements, nor have I received any
15 undisclosed compensation in this case. The only compensation I will receive is whatever amount
16 the Court awards as an Enhancement Award, as well as my share of the settlement as an
17 aggrieved employee.

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

20 Executed this ^{08/03/2022} ____ day of August 2022, at Bellflower, California.

21  2022-08-03 18:33:36 UTC - 104.4.238.106
Nintex AssureSign® 9797bda-862f-4560-9721-aea601302a81

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