

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
Mossamat N. Karim (SBN 329711)
nkarim@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

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

STEVE DIAB QAWAS, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

SOCAL FRAMING, INC., a California
Corporation; and DOES 1 through 100,

Defendants.

CASE NO. RIC1902588

*[Case assigned for all purposes to the Hon.
Sunshine S. Sykes, Dept. 06]*

**DECLARATION OF STEVE QAWAS IN
SUPPORT OF APPROVAL OF CLASS
ACTION SETTLEMENT**

Action Filed: April 23, 2019
Trial Date: None Set

DECLARATION OF STEVE QAWAS

I, Steve Qawas, 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 SoCal Framing Inc. ("Socal Framing") in California from approximately June 2016 to approximately August 2020. During my employment, I was paid solely based on the square footage of projects I completed. I typically worked 10 hours per day, but I did not get paid overtime. I was not paid for other tasks, such as performing maintenance on machines, refueling equipment, refilling supplies, and attending mandatory safety meetings and trainings. My meal and rest breaks were not scheduled throughout the day which led to me not being able to take those breaks when work was busy or when there was an emergency.

3. I started this lawsuit against Socal Framing because I wanted Socal Framing 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 Socal Framing 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 Socal Framing'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 Socal Framing's practices to my attorneys, and helping identify other employees who also experienced the same issues that I did. I estimate that I have spent at least 15 total hours on these activities.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on 11/14/20, in Sun City, California.


Steve Qawas