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Attorneys for AARON ROMERO, on behalf of himself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF KERN

AARON ROMERO on behalf of
himself, all others similarly situated, and
on behalf of the general public,

Plaintiffs,

v.

VITRO FLAT GLASS, LLC; and
DOES 1-100,

Defendants.

Case No. BCV-21-101357

**PLAINTIFF AARON ROMERO'S DECLARATION
IN SUPPORT OF HIS MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT,
ATTORNEYS' FEES, COSTS, NAMED PLAINTIFF
SERVICE AWARD, AND ENTERING OF FINAL
JUDGMENT**

Date: June 14, 2022
Time: 8:30 a.m.
Judge: Hon. Bernard C. Barmann, Jr.
Division: H

Complaint Filed: June 15, 2021
Trial Date: None Set

1 I, AARON ROMERO, hereby declare under penalty of perjury as follows:

- 2 1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and
3 would competently testify thereto, except as to those matters stated upon information and
4 belief, and as to those matters, I believe them to be true.
- 5 2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit
6 this declaration in support of settlement approval.
- 7 3. I worked for Vitro Flat Glass, LLC (“Vitro”) as in California from approximately 2017 to
8 March 2020.
- 9 4. Since filing this case, I have been in constant communication with my attorneys. I always
10 answered phone calls from my attorneys and called them back promptly when they called. I
11 have worked diligently to help progress the case.
- 12 5. I was aware that, at some point in this case, I would have my deposition taken. I knew that the
13 deposition could take a full day and that I may have to meet with my attorneys prior to my
14 deposition. I was at all times ready and willing to sit for my deposition.
- 15 6. I gave my consent to settle with Vitro for the gross settlement amount of \$1,200,000. I
16 completely and carefully reviewed and signed the Memorandum of Understanding (“MOU”)
17 and settlement agreement.
- 18 7. In light of the work I performed in this case and the duties associated with being a class
19 representative in a case of this magnitude, I believe the \$10,000 enhancement award request
20 is reasonable. I understand that this additional service award is not guaranteed and is subject
21 to Court approval.
- 22 8. I have and will continue to adequately represent all of the interests of the class. With my status
23 as class representative, I have and will continue to treat the interests of the class above my
24 interests.
- 25 9. My claims are typical of the Class Members because I am similarly situated to all hourly, non-
26 exempt employees of Vitro in California who worked at any time from October 5, 2016 to
27 August 29, 2021. Thus, my interests are the same as all members of the proposed Class.
28

1 10. From the very beginning of the case, I understood that I was participating in this case, not only
2 for my own benefit, but for the benefit of the many past and present employees.

3 11. I recognize that any resolution of this matter must be approved by the Court in terms of
4 whether the settlement is fair and reasonable, and that I am obligated to protect the interests
5 of all of class members for the Class Period.

6 I declare under penalty of perjury under the laws of the State of California that all the
7 foregoing is true and correct.

8
9 Dated: 5/19/2022 | 5:34:47 PM PDT

DocuSigned by:
By: _____
C75F8B0A1MC48A AARON ROMERO