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

ROBERT LAWSON, on behalf of himself
and all "aggrieved employees" pursuant to
Labor Code § 2698 *et seq.*,

Plaintiff,

v.

GRAPHIC PACKAGING
INTERNATIONAL, LLC, a Delaware limited
liability company, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: 20CV01921

*Assigned to the Honorable Stephen E.
Benson, Dept. 6*

CLASS ACTION

**DECLARATION OF MARCOS CASTRO
IN SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
UNOPPOSED APPLICATION FOR
APPROVAL OF ATTORNEYS' FEES
AND COSTS, CLAIMS
ADMINISTRATION FEES, AND CLASS
REPRESENTATIVES' SERVICE
PAYMENTS**

DATE: October 5, 2022

TIME: 9:00 a.m.

DEPT.: 6

Action Filed: September 29, 2020

DECLARATION OF MARCOS CASTRO IN SUPPORT OF UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND UNOPPOSED APPLICATION FOR APPROVAL OF ATTORNEYS' FEES AND
COSTS, CLAIMS ADMINISTRATION FEES, AND CLASS REPRESENTATIVES' SERVICE PAYMENTS

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1 I, Marcos Castro, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendant Graphic
3 Packaging International, LLC ("Defendant") and I submit this declaration in support of
4 Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and
5 Plaintiffs' Unopposed Application for Attorneys' Fees and Costs, Claims Administration
6 Fees, and Class Representatives' Service Payments. I am a competent adult and worked
7 for Defendant as a non-exempt employee during the Class Period. I have personal
8 knowledge of the facts set forth herein, and if called as a witness to testify to them, I
9 could and would do so competently.

10 2. I contacted my current attorneys when I questioned the employment
11 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to
12 act as a Class Representative in a class action on behalf of other employees of Defendant
13 who I believed were being subjected to labor law violations. Although presented with
14 the opportunity, I did not to pursue this case on an individual basis and instead did so as
15 a class action so that I could help other employees recover for what I believed were
16 Defendant's illegal practices.

17 3. Specifically, I questioned Defendant's policies of failing to pay all wages,
18 failing to provide meal and rest breaks, failing to reimburse business expenses, issuing
19 its employees incorrect paystubs, and failing to timely pay wages. Through many
20 discussions with my lawyers, I learned these may be illegal practices and Defendant's
21 employees might have recourse for them.

22 4. By bringing this lawsuit, and throughout its course, I have put the interests
23 of the class ahead of my own. I understood that I could possibly earn a small
24 enhancement payment if this case resolved itself favorably, but always knew that I could
25 also be responsible for paying Defendant's attorneys' fees and costs if it did not. My
26 goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and even
27

1 more importantly, to put an end to what I believed were illegal practices on the part of
2 Defendant. I believe I have achieved both through this lawsuit and settlement.

3 5. I am very happy about the results of this litigation. I am satisfied that
4 Defendant is compensating class members for wages, penalties and interest that I believe
5 we are due.

6 6. At the onset of this case, I spent time through numerous phone calls with
7 several of my attorneys explaining what I understood to be the policies and procedures
8 of Defendant and how they were applied to me and others I worked with. During the
9 course of this litigation, up through and following the settlement process, I kept actively
10 involved with its status, tracking the status of the case and participating as much as
11 possible.

12 7. While I have not maintained detailed time records of my activities in
13 connection with this litigation, I believe that have spent a total of approximately 20
14 hours assisting my attorneys with the preparation of this case, and doing work and
15 analysis independent from my attorneys both before and during this case, including
16 conducting an independent investigation of the facts.

17 8. Before this litigation commenced, and throughout its course, I have spent
18 approximately 3 or more hours gathering, organizing, and reviewing documents and
19 information for this lawsuit. I sifted through many of my own documents and reviewed
20 information produced by Defendant as part of this case.

21 9. I routinely communicated with my attorneys to track my case's status. I
22 have taken an active involvement in this matter throughout its course.

23 10. This lawsuit will almost certainly result in reputational harm to me. There
24 is a stigma associated with suing anyone, let alone your former employer. I will
25 probably be adversely affected when it comes to obtaining future employment --
26 employers who learn that I sued Defendant in a class action will likely avoid hiring me.

1 11. I do not believe that I have any conflicts with other members of the class.
2 My interests in bringing this lawsuit – for Defendant to change its labor practices going
3 forward and to compensate current and former employees – are the same as those of all
4 other class members.

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

7 Executed on this 21st day of September, 2022 at Placentia, California.

8
9 DocuSigned by:

Marcos Castro

MARCOS CASTRO