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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

FAUSTINO RAMOS and ALBERTO MEZA
SOLIS, as individuals and on behalf of all
others similarly situated,

Plaintiffs,

vs.

HYATT DIE CAST AND ENGINEERING
CORPORATION–SOUTH, a California
corporation; PARTNERS PERSONNEL –
MANAGEMENT SERVICES, LLC, a
Delaware limited liability company; NEXEM
PARTNERS, LLC, a Delaware limited
liability company; and DOES 1 through 100,

Defendants.

Case No. 30-2020-01174518-CU-OE-CXC

*[Assigned for all purposes to the Hon. Peter J.
Wilson, Dept. CX-101]*

**DECLARATION OF SEAN M. BLAKELY
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: August 24, 2023
Time: 2:00 p.m.
Dept.: CX-101

Complaint Filed: December 14, 2020
Trial Date: None Set

1 I, SEAN M. BLAKELY, declare as follows:

2 1. I am a Partner at the Haines Law Group, APC, and co-counsel for the named
3 Plaintiffs Faustino Ramos and Alberto Meza Solis (“Plaintiffs”) and the proposed Settlement
4 Class in the above-captioned matter. I am a member in good standing of the bar of the State of
5 California and am admitted to practice in this Court. I have personal knowledge of the facts
6 stated in this declaration and could testify competently to them if called upon to do so.

7 2. I am a 2008 graduate of Southwestern Law School. I was admitted to the
8 California State Bar in September 2009. From December 2010 to September 2011, I worked as
9 a Law Clerk for Rose, Klein & Marias, a civil litigation firm in Long Beach, California. At Rose,
10 Klein & Marias I assisted trial attorneys in employment and personal injury cases. From
11 September 2011 to May 2016, I worked as an associate at the employment law firm of Mahoney
12 Law Group, APC in Long Beach, California. The vast majority of my work at Mahoney Law
13 Group, APC focused on representing employees in wage and hour class actions. My work at
14 Mahoney Law Group, APC also included representing employees in individual claims for
15 wrongful termination, harassment, discrimination, and retaliation. Although non-exhaustive, the
16 types of work I performed at Mahoney Law Group, APC included: conducting client intakes;
17 performing pre-filing research and analysis; drafting complaints; attending court hearings;
18 corresponding with opposing counsel; drafting and responding to written discovery; preparing
19 for and taking and defending depositions; analyzing payroll and timekeeping records and
20 employee handbooks; opposing motions for summary judgment, as well as a variety of other
21 motions such as motions for remand, demurrers and motions to dismiss, motions to strike,
22 motions to compel, motions to quash, and motions for class certification; drafting mediation
23 briefs, attending mediations; drafting long-form settlement agreements; drafting motions for
24 preliminary and final settlement approval; and overseeing the claims process.

25 3. Since November 8, 2016, I have worked at my current firm, Haines Law Group,
26 APC, where, in 2020, I became a Partner. I am currently staffed on over forty (40) active wage
27 and hour class and representative actions in both state and federal court.

28 4. The following is a non-exhaustive list of wage and hour class actions in which I

1 have been appointed as class counsel and/or played a significant role in prosecuting the litigation,
2 and which have received final approval: *Santimateo v. Sun Healthcare Group, Inc., et al*, Case
3 No. BC471884, California Superior Court, Los Angeles County, Judge Jane L. Johnson presiding
4 (granted final approval of settlement on behalf of employees at rehabilitation facility involving
5 claims for unpaid wages and meal and rest period violations, and other claims, in which I was
6 approved at an hourly rate of \$325 for work performed in 2012-2013); *Teyuca v. Pacific Alliance*
7 *Medical Center, Inc.*, California Superior Court, Los Angeles County, Judge William F.
8 Highberger presiding (granting final approval of settlement on behalf of healthcare workers for
9 unpaid wages, meal and rest period violations, and other claims, in which I was approved at an
10 hourly rate of \$325 for work performed in 2012-2013); *Arteaga v. Command Center Security,*
11 *Inc.*, Case No. BC480496, California Superior Court, Los Angeles County, Judge John Shepard
12 Wiley, Jr. presiding (granting final approval of settlement on behalf of security guards involving
13 claims for unpaid overtime, meal and rest period violations, and other claims, in which I was
14 approved at an hourly rate of \$425 for work performed in 2012-2015); *Casadine v. Maxim*
15 *Healthcare Services, Inc.*, Case No. CV 12-10078-DMG (CWx), United States District Court,
16 Central District of California, Judge Dolly M. Gee presiding (granting final approval of
17 settlement on behalf of home health care employees involving claims for unpaid wages and other
18 claims, in which I was approved at an hourly rate of \$425 for work performed in 2012-2015);
19 *Guzman v. Andrew Lauren Interiors, Inc., et al.*, Case No. BC567757, California Superior Court,
20 Los Angeles County, Judge Elihu M. Berle presiding (granting final approval of settlement on
21 behalf of construction workers involving claims for unpaid wages, meal and rest period violation,
22 and other claims, in which I was approved at an hourly rate of \$425 for work performed in 2014-
23 2016); *Booker v. The Goodyear Tire and Rubber Company*, Case No. BC498399, California
24 Superior Court, Los Angeles County, Judge Amy Hogue presiding (granting final approval of
25 settlement on behalf of tire mechanics involving claims for unpaid wages, meal and rest period
26 violations, and other claims, in which I was approved at an hourly rate of \$425 for work
27 performed in 2013-2015); *Nunez v. CompuCom Systems, Inc.*, Case No. BC618385, California
28 Superior Court, Los Angeles County, Judge John Shepard Wiley, Jr. presiding (granting final

1 approval of settlement on behalf of IT support workers for overtime, meal and period,
2 reimbursement, and related violations, approved at hourly rate of \$475 for work performed in
3 2016 and 2017); *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-
4 OE-CXC, California Superior Court, Orange County, Judge William D. Claster presiding
5 (granting final approval of settlement on behalf of non-exempt employees of a chemical
6 manufacturing company involving claims for unpaid overtime and waiting time penalties); *Razon*
7 *v. TTM Technologies, Inc., et al.*, Case No. 37-2016-00038326-CU-OE-CTL, California Superior
8 Court, San Diego County, Judge Gregory W. Pollack presiding (granting final approval of
9 settlement involving claims for unpaid overtime wages, wage statement violations, and meal
10 period violations); *Blank v. Coty, Inc., et al.*, Case No. BC624850, California Superior Court,
11 Los Angeles County, Judge Williams F. Highberger presiding (granting final approval of
12 settlement involving claims for wage statement violations, meal period violations, and other
13 claims); *Morales v. Caremeridian, LLC, et al.*, Case No. BC593191, California Superior Court,
14 Los Angeles County, Judge William F. Highberger presiding (granting final approval of
15 settlement on behalf of direct support professionals involving claims for unpaid wages, meal and
16 rest period violations, wage statement violations, and other claims); *Aguilar v. Act Fulfillment,*
17 *Inc.*, Case No. RIC1616643, California Superior Court, Riverside County, Judge Sharon J.
18 Waters presiding (granting final approval of settlement on behalf of non-exempt factory workers
19 involving claims for meal period violations); *Sandoval v. AMCOR Flexibles Inc.*, Case No.
20 BC617499, California Superior Court, Los Angeles County, Judge Kenneth R. Freeman
21 presiding (granting final approval of settlement on behalf of manufacturing employees involving
22 claims for unpaid wages, meal period violations, rest period violations, and waiting time
23 penalties); *Le v. GBW Railcar Services, L.L.C.*, Case No. RIC1612209, California Superior
24 Court, Riverside County, Judge Sharon J. Waters presiding (granting final approval of settlement
25 on behalf of non-exempt employees of a freight railcar manufacturer involving claims for unpaid
26 overtime and minimum wages, meal period violations, and rest period violations); *Silva v. ADJ*
27 *Products, LLC*, Case No. BC618581, California Superior Court, Los Angeles County, Judge
28 William F. Highberger presiding (granting final approval of settlement involving claims for

1 unpaid overtime and minimum wages, rest period violations, wage statement violations, and
2 waiting time penalties); *Lira v. Discus Dental, LLC, et al.*, Case No. CIVDS1620402, California
3 Superior Court, San Bernardino County, Judge David Cohn presiding (granting final approval of
4 settlement on behalf of non-exempt manufacturing employees involving claims for unpaid
5 minimum and overtime wages, meal and rest period violations, and other claims); *Gonzales v.*
6 *PathPoint*, Case No. BC657147, California Superior Court, Los Angeles County, Judge Carolyn
7 B. Kuhl presiding (granting final approval of settlement on behalf of non-exempt direct support
8 professionals involving claims for meal and rest period violations and other claims); *Duran v.*
9 *PRADA USA CORP.*, Case No. BC644319, California Superior Court, Los Angeles County,
10 Judge Maren E. Nelson presiding (granting final approval of settlement on behalf of non-exempt
11 commissioned salespersons involving claims for unpaid overtime wages, meal and rest period
12 violations, failure to reimburse for necessary expenditures, and other claims); *Banegas v. UPM,*
13 *Inc.*, Case No. BC644438, California Superior Court, Los Angeles County, Judge Carolyn B.
14 Kuhl presiding (granting final approval of settlement on behalf of non-exempt manufacturing
15 employees involving claims for unpaid wages, meal and rest period violations, and other claims);
16 *Palafox v. Pacific Line Clean-Up, Inc.*, Case No. 30-2017-00921632-CU-OE-CXC, California
17 Superior Court, Orange County, Judge William D. Claster presiding (granting final approval of
18 settlement on behalf of non-exempt employees involving claims for unpaid overtime wages, meal
19 and rest period violations, and other claims); *Janet Arroyo v. AST Sportswear, Inc., dba Bayside*
20 *Apparel Manufacturing, Inc.*, Case No. 30-2017-00909663-CU-OE-CXC, California Superior
21 Court, Orange County, Judge Glenda Sanders presiding (granting final approval of settlement on
22 behalf of non-exempt garment employees involving claims for unpaid minimum wages, meal
23 and rest period violations, and other claims); *Carlos Garcia v. Fabrica International, Inc.*, Case
24 No. 30-2017-00949461-CU-OE-CXC, California Superior Court, Orange County, Judge
25 William D. Claster presiding (granting final approval of settlement on behalf of non-exempt
26 manufacturing employees involving claims for unpaid minimum and overtime wages, meal and
27 rest period violations, and statutory penalties); *Jonathan Leon v. Piercey West, Inc.*, Case No.
28 BC656874, California Superior Court, Los Angeles County, Judge Amy D. Hogue presiding

(granting final approval of settlement on behalf of non-exempt commissioned salespersons and other employees involving claims for unpaid wages, meal and rest period violations, unreimbursed business expenses, and other claims); and *Matthew Tovar, et al. v. Rentokil North America, Inc.*, Case No. BC676386, California Superior Court, Los Angeles County, Judge Daniel J. Buckley presiding (granting final approval of settlement on behalf of non-exempt employees involving claims for unpaid overtime, meal and rest break violations, and other claims); *Seungmin Samantha Lee v. Infor (US) Inc.*, Case No. CGC-18-566393, California Superior Court, San Francisco County, Judge Ethan P. Schulman presiding (granting final approval of settlement on behalf of sales development representatives involving claims for unpaid overtime, meal and rest period violations, and penalty claims); *Tracy Aguilar, et al. v. Aero Port Services, Inc.*, Case No. BC659234, California Superior Court, Los Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf of non-exempt employees involving claims for meal and rest period violations, and other claims); *Carlos Perez, et al. v. Moss Bros. Auto Group, Inc., et al.*, Case No. RIC1709905, California Superior Court, Riverside County, Judge Sunshine S. Sykes presiding (granting final approval of settlement on behalf of non-exempt commissioned salespersons involving claims for unpaid wages, meal and rest period violations, other claims); *Julio Alfaro v. Orange Automotive d/b/a Kia of Orange*, Case No. 30-2017-00945105-CU-OE-CXC, California Superior Court, Orange County, Judge Randall J. Sherman presiding (granting final approval settlement on behalf of non-exempt commissioned employees involving claims for unpaid wages, meal and rest period violations, unreimbursed business expenses, and penalty claims); *Sepulveda, et al. v. Caliber Collision Transport Service LLC, et al.*, Case No. BC669786, California Superior Court, Los Angeles County, Judge Carolyn B. Kuhl presiding (granting final approval of settlement on behalf of non-exempt commissioned employees involving claims for unpaid wages, meal and rest period violations, and penalty claims); *Mariela Cruz v. Traina Dried Fruit, Inc.*, Case No. 9000819, California Superior Court, Stanislaus County, Judge Marie Sovey Silveira presiding (granting final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages, meal and rest period violations, and penalty claims); *Joshua Anthony v. Semper Solaris*

1 *Construction Inc.*, Case No. 37-2018-00035320-CU-OE-CTL, California Superior Court, San
2 Diego County, Judge Gregory W. Pollack presiding (granting final approval of settlement on
3 behalf of non-exempt employees involving claims for overtime wages, wage statement penalties,
4 waiting time penalties, and PAGA civil penalties); *Fabio Gallo v. Coast Composites, LLC*, Case
5 No. 30-2018-01016120-CU-OE-CXC, California Superior Court, Orange County, Judge Glenda
6 Sanders presiding (granting final approval of settlement on behalf of non-exempt employees
7 involving claims for wage statement violations and PAGA civil penalties); *Maria Jessenia*
8 *Gomez, et al. v. CareMeridian, LLC*, Case No. BC655730, California Superior Court, Los
9 Angeles County, Judge William F. Highberger presiding (granting final approval of settlement
10 on behalf of non-exempt nursing employees involving claims for meal and rest period violations,
11 minimum and overtime violations, and penalty claims); *Alfredo Villarreal v. Spenuzza, Inc.*, Case
12 No. RIC1902836, California Superior Court, Riverside County, Judge Sunshine S. Sykes
13 presiding (granting final approval of settlement on behalf of non-exempt manufacturing
14 employees involving claims for unpaid wages, meal and rest period violations, and various
15 penalty claims); *Rosalie A. Wayman v. San Fernando Valley Automotive, LLC, et al.*, Case No.
16 19STCV35904, California Superior Court, Los Angeles County, Judge Maren E. Nelson
17 presiding (granting final approval of settlement on behalf of commission-based employees
18 involving claims for unpaid minimum wages, meal and rest period violations, and penalty
19 claims); *Danielle Bradley Queen, et al. v. Unlimited Quest, Inc.*, Case No. CIVDS1716151,
20 California Superior Court, San Bernardino County, Judge David Cohn presiding (granting final
21 approval of settlement on behalf of non-exempt Direct Support Professionals and Program
22 Supervisors involving claims for rest period violations, unpaid wages, failure to reimburse for
23 necessary business expenditures, wage statement violations, and other penalty claims); *Fabian*
24 *Santana, et al. v. A.M. Cabinets, Inc.*, Case No. 19STCV00803, California Superior Court, Los
25 Angeles County, Judge Daniel J. Buckley presiding (granting final approval of settlement on
26 behalf of non-exempt employees involving claims for unpaid wages, meal and rest period
27 violations, wage statement violations, failure to reimburse for necessary business expenditures,
28 and other penalty claims); *Jonathan Reyes-Delcid v. SNS Transportation Services Inc.*, Case No.

1 BC683026, Judge Daniel J. Buckley presiding (granting final approval of settlement on behalf
2 of non-exempt employees involving claims for piece-rate violations, unpaid wages, meal and rest
3 period violations, failure to reimburse for necessary business expenditures, and other penalty
4 claims); *Damien Dana Council v. Professional Courier & Newspaper Distribution, et al.*, Case
5 No. BC715054, California Superior Court, Los Angeles County, Judge Amy D. Hogue presiding
6 (granting final approval of settlement on behalf of non-exempt employees involving claims for
7 unpaid wages, meal and rest period violations, and various penalty claims); and *Jose Jimenez v.*
8 *Fenceworks, Inc.*, Case No. 30-2018-01034150-CU-OE-CXC, California Superior Court,
9 Orange County, Judge William D. Claster presiding (granting final approval of settlement on
10 behalf of non-exempt employees involving claims for piece-rate violations, unpaid wages, meal
11 period violations, and various penalty claims).

12 5. I have also moved to certify and have received an order certifying a class action
13 in *Ontiveros v. Safelite Fulfillment, Inc., et al.*, Case No. CV 15-7118-DMG (RAOx), United
14 States District Court, Central District of California, Honorable Dolly M. Gee presiding
15 (certifying six classes of employees for rest period violations, wage statement violations, meal
16 period violations, and overtime and double-time violations); and *Vazquez v. Kraft Heinz Foods*
17 *Company*, Case No. 16-CV-02749-WQH (BLM), United States District Court, Southern District
18 of California, Honorable William Q. Hayes, presiding (certifying unpaid wages classes, meal
19 period classes, wage statement class, and waiting time penalty class).

20 6. In 2018, 2019, 2020, 2021, and 2022, Thomson Reuters recognized me as a Top
21 Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyers. This
22 is an honor awarded to no more than two-and-a-half percent (2.5%) of attorneys under the age of
23 forty in Southern California each year.

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7. As co-counsel for Plaintiffs, I am intimately involved with this litigation and am familiar with all aspects of this litigation. The details of the work completed in this case by me and the other attorneys in my firm are set forth in the declaration of Paul K. Haines filed concurrently herewith.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 22, 2023, at El Segundo, California.


Sean M. Blakely