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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 PLAINTIFF
FAUSTINO RAMOS IN SUPPORT OF
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

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I, FAUSTINO RAMOS, declare as follows:

1. I am an individual over the age of 18 and am one of the named plaintiffs 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 Defendants Hyatt Die Cast and Engineering Corporation-South (“Hyatt Die”), Partners Personnel – Management Services, LLC (“Partners Personnel”) and Nexem Partners, LLC (“Nexem Partners”) (collectively “Defendants”) as a non-exempt “Die Cast Operator” from approximately July 2013 to approximately July 2020, and I was subject to Defendants’ wage and hour policies at issue in this action.

3. During my employment, I clocked into Defendants' timekeeping system which recorded my time to the minute, however, Defendants rounded my time punch entries to the nearest quarter of an hour, which I believe resulted in me being underpaid for the hours that I worked. Also, my meal periods were often less than a full 30 minutes due to Defendants' bell system, which cut my meal periods short. I also did not always receive a second meal period when I worked shifts of more than 10.0 hours. Additionally, I was not always able to take all rest periods during my employment, including a third rest period when I worked over 10.0 hours. As a result of these violations, it is my understanding that Defendants did not issue accurate wage statements or pay me all wages that were owed to me upon my separation of employment.

4. I have been actively involved in this case since I first retained Haines Law Group, APC (“HLG”) in September 2020. Since then, I have had many discussions with the attorneys and staff at HLG, including regarding Defendants’ wage and hour policies and my claims in this case, litigation strategy, potential witnesses, updates on how the case was proceeding, and how I could help the case and the potential Settlement Class members. I also provided information and documents to my attorneys to assist them in mediation and negotiating the Settlement. I also spent time reviewing and discussing the Settlement Agreement as well as other documents from my attorneys, and reviewing my own records for documents that would be potentially relevant to the

1 case. In total, I estimate that I have spent approximately 35-40 hours in connection with this case
2 since I first retained HLG in 2020.

3 5. When I retained HLG and decided to pursue this case, I understood it could benefit
4 former and current Defendants employees by helping to recover unpaid wages, meal and rest
5 period premiums, and other penalties on their behalf. I also knew there was a risk I could be liable
6 for Defendants' costs if we lost the case. I also understood that filing a lawsuit is a public record.
7 However, I accepted those risks because I wanted Defendants to pay its current and former
8 employees properly and to provide them with proper breaks. As far as I am aware, I have no actual
9 or potential conflicts with any of the other Settlement Class members.

10 6. As part of the proposed Settlement, and in exchange for my requested service
11 payment, I have also agreed to a full release of claims related to my employment with Defendants
12 that extends beyond the release of claims applicable to other Settlement Class members.

13 7. I understand that my attorneys will request that the Court approve a service
14 payment of \$5,000 for my efforts on behalf of the Settlement Class members, as well as my full
15 release of claims. I believe this amount is reasonable based on the amount of time and effort I
16 have devoted to this case, the amount of time that has passed since my lawsuit was first filed in
17 December 2020, as well as the risks I have undertaken as a class representative, as described
18 above. This proposed service payment is not contingent upon me supporting the proposed
19 Settlement.

20 I declare under penalty of perjury under the laws of the State of California and the United
21 States that the foregoing is true and correct. Executed on June 22, 2023 at
22 Rialto _____, California.

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Faustino Ramos (Jun 23, 2023 00:45 PDT)

24 Faustino Ramos
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Faustino Ramos v. Hyatt Die Cast and Engineering Corporation - South, et al.
Orange County Superior Court Case No. 30-2020-01174518-CU-OE-CXC

On June 23, 2023, I served the foregoing document(s) described as:

**DECLARATION OF PLAINTIFF FAUSTINO RAMOS IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

on the interested party(ies) in this action as follows:

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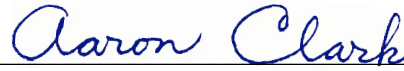
THE NOURMAND LAW FIRM, APC

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Beverly Hills, California 90211
Attorneys for Plaintiffs FAUSTINO RAMOS and ALBERTO MEZA SOLIS

1 [X] (VIA ELECTRONIC MAIL) Based on court order or an agreement of the parties to accept
2 electronic service, I caused the document described above to be sent to the persons at the
3 electronic service addresses listed above via third party cloud service One Legal.

4 [X] (STATE) I declare under penalty of perjury under the laws of the State of California that the
5 above is true and correct.

6 Executed on June 23, 2023, at El Segundo, California.



Aaron Clark