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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – POMONA COURTHOUSE SOUTH**

ALFREDO SALAZAR, individually, and on
behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act,

Plaintiff,
vs.

CPP-CITY OF INDUSTRY CAST PARTS,
INC., an unknown business entity; CAST
PARTS, INC., an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

ANA NUNEZ, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

CAST PARTS, INC., DBA
CONSOLIDATION PRECISION
PRODUCTS, a corporation; and DOES 1-20,
inclusive,

Defendants.

Lead Case No.: 21PSCV00014
Consolidated with 21STCV08428

Honorable Christian R. Gullon
Department O

**DECLARATION OF ANA NUNEZ IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE § 2698,
ET SEQ.) SETTLEMENT AGREEMENT AND
AWARD OF PAGA COUNSEL FEES
PAYMENT, PAGA COUNSEL LITIGATION
EXPENSES PAYMENT GENERAL RELEASE
FEE, AND ADMINISTRATION EXPENSES
PAYMENT**

Reservation ID: 516546408269
Date: January 9, 2025
Time: 10:00 AM
Department: O

Salazar Action Filed: January 7, 2021
Nunez Action Filed: March 3, 2021
Trial Date: None Set

DECLARATION OF ANA NUNEZ

I, **Ana Nunez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Cast Parts Inc. ("CPI" "Company" or "Defendant") from approximately March 2001 to approximately July 2020 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted KJT Law Group, LLP and spoke with the attorneys there.

3. I was informed that if I were to file this matter as a representative action under the Private Attorneys General Act California Labor Code (Cal. Lab. Code §§ 2698, *et seq.*) ("PAGA"), I would not just be acting on behalf of myself, but also the State of California and all other non-exempt employees, whom also were subjected to these same wage-and-hour violations. I understood that any representative lawsuit could take several years to complete and would require my commitment and services throughout. I also understood that had I acted for myself alone, I may have had a speedier outcome had I proceeded with a claim through the California Labor Commissioner's office.

4. After I agreed to be a plaintiff and representative for other aggrieved employees, my attorneys asked me to gather information and documents in my possession related to my employment with Defendant. I was able to find some of these documents and provided them to my attorneys.

5. On March 3, 2021, my attorneys filed a representative action complaint in Los Angeles Superior Court on behalf of the State of California and all similarly aggrieved employees in California employed by Defendant. I am the representative for the State of California and these aggrieved employees.

6. As the representative in this case, I was informed my deposition would likely be taken, that preparation and the deposition itself could potentially take several days and that it may likely be difficult while answering questions under oath — especially if it were videotaped. I started thinking about the deposition and preparing myself for it early, so I'd be prepared and comfortable when the date and time were set. My deposition was not taken, but I feel I would have been ready if it had been.

7. On the actual day of mediation, on July 25, 2024, I was available for further questioning

1 and for approval of any settlement. I believe that the insight I provided was integral to obtaining a
2 maximum recovery for the State of California and other aggrieved employees.

3 8. For my broader individual waiver and release of claims with a California Civil Code
4 Section 1542 waiver (set forth in Section 5 of the Settlement Agreement), the Settlement provides for a
5 General Release Fee in the amount of \$7,500.00, to be paid out of the Gross Settlement Amount,
6 subject to Court approval. I respectfully request that the Court award me full payment of the General
7 Release Fee.

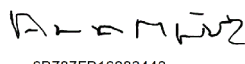
8 9. I am not related to anyone associated with Lawyers *for* Justice, PC or KJT Law Group,
9 LLP.

10 10. I have not entered into any undisclosed agreements, nor have I received any undisclosed
11 compensation in this case. The only compensation I will receive is whatever amount the Court awards
12 as a general release fee, as well as my share of the settlement as an aggrieved employee.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct.

15 Executed this 24 day of October 2024, at Los Angeles, California.

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DocuSigned by:

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Ana Nunez