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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 ALFREDO SALAZAR 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 a.m.
Department: O

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

DECLARATION OF ALFREDO SALAZAR

I, **Alfredo Salazar**, 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 November 2004 to approximately March 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 Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. I consulted with the attorneys at Lawyers *for* Justice, PC for **3 hours** discussing my situation, representative action lawsuits under the Private Attorney General Act (“PAGA”), and what it meant to bring a PAGA Action and be a PAGA representative.

3. I have spent over **10 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant reviewing documents with my attorneys, providing information regarding the duties of aggrieved employees, writing a declaration in opposition to Defendant’s Motion to Compel Arbitration, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **5 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant. I responded to Defendant’s discovery requests, including Form Interrogatories, Requests for Production, and Special Interrogatories.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement and about **1 hour** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case.

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

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

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

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

Executed this 17 day of October 2024, at Montebello, California.

Electronically Signed 2024-10-17 00:10:32 UTC - 172.56.235.21

Alfredo Salazar

Microsoft Account Email®

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Alfredo Salazar