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

LEOPOLDO ORDAZ, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

METLANG LLC, a Delaware limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: BCV-20-102983

[Assigned for all purposes to the Hon. Thomas
S. Clark, Department 17]

**DECLARATION OF LEOPOLDO ORDAZ
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: August 5, 2022

Time: 8:30 A.M.

Dept.: 17

DECLARATION OF LEOPOLDO ORDAZ

I, Leopoldo Ordaz, declare as follows:

1. I am an individual over the age of 18 and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I began my employment with Defendant Metlang LLC ("Defendant") in or around May 2019. I am a non-exempt, or hourly Spanish Analytic Linguist.

3. During my employment with Defendant, I was not provided with proper and accurate itemized wage statements. Specifically, I received wage statements that did not identify the pay period start and/or end dates. Rather, the wage statement only identified a paycheck date and a period ending date that specifically corresponds to health and welfare pay.

4. During the pendency of this lawsuit, I was required to provide assistance to my attorneys regarding this matter. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendants' practices. To date, I have performed a number of tasks in my role as the representative. This includes the following:

- a. Discussions with my attorneys to discuss this case and the facts involved on numerous occasions at various stages of the lawsuit, from inception to settlement;
- b. Gather documents related to this case;
- c. Reviewing pleadings and documents in this case, including the complaint, PAGA letter to the California Labor & Workforce Development Agency, my personnel file and pay stubs, documents pertaining to Defendants' policies, and my declarations;
- d. Providing information and responding to questions from my attorneys on a regular basis;
- e. Remaining available during mediation; and
- f. Reviewing and executing the Settlement Agreement.

1 5. I understand that this action was brought on behalf of other non-exempt
2 employees of Defendants in California, and that I am acting as a representative for the Class. I
3 do not believe that I have any interests that are adverse to the other employees that are part of
4 the settlement. As the Class Representative, I understand that it is my responsibility to act in
5 the best interests of the Class and not my own. I agree that I will not put my own interests
6 ahead of that of the Class, and that I will not settle out my class claims in this lawsuit
7 separately or independently from the Class. Moreover, I am not aware of any conflicts that
8 exist between my interests and the interests of the Class that would impair or affect my ability
9 to serve as representative for the Class.

10 6. I have and continue to be willing to assist in the investigation of this matter,
11 including meeting, conferring, discussing the case with my attorneys, providing any necessary
12 information and documents, making myself available for trial or any further proceedings in this
13 matter as required to represent the interests of the Class. I also understand my duties and
14 responsibilities to the proposed Class and will carry out those duties as necessary.

15 7. I have reviewed the Settlement Agreement and discussed the terms of the
16 settlement with my attorneys, and I believe the settlement to be fair, adequate, and reasonable
17 for myself and for other employees part of the settlement.

18 8. I am aware and have been aware from the inception of the case, that there is a
19 risk that if I do not win my case, I could have been liable for Defendant's legal costs had
20 Defendant prevailed. I accepted that risk in this case.

21 9. I also understand that filing this lawsuit is a public record and I accepted that
22 burden. As such, I risked my future employment in order to bring this action. As this lawsuit is
23 a public record, it may affect my ability to obtain future employment as prospective employers
24 may look into this lawsuit and may not be willing to hire me. I am aware of the negative
25 impact of the lawsuit on my employment prospects and accepted that risk.

26 10. I am proud of the result and accomplishment of this lawsuit. I understand that
27 because others have benefited by this case and the action that I have taken. I feel that I took
28

11. I also executed a general waiver of any and all claims, known and unknown.
12. I have no relationship or connection of any kind with Legal Aid at Work.

Executed on this 8th day of July 2022, at Bakersfield, California.

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DECLARATION OF LEOPOLDO ORDAZ IN SUPPORT OF PLAINTIFF’S MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT