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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

KOREY CURLEY and SCOTT RYAN, on
behalf of themselves and other similarly-
situated and aggrieved employees,

Plaintiffs,

vs.

PAR WESTERN LINE CONTRACTORS,
LLC, a Delaware corporation; PAR
ELECTRICAL CONTRACTORS, INC., a
Missouri corporation; QUANTA
SERVICES, INC., a Delaware corporation;
and DOES 1 through 100,

Case No. 37-2021-00019761-CU-OE-CTL

*[Case assigned for all purposes to the Hon.
Katherine Bacal, Dept. C-63]*

**DECLARATION OF PLAINTIFF KOREY
CURLEY IN SUPPORT OF APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: November 21, 2025

Time: 1:30 p.m.

Dept.: C-63

Action Filed: May 4, 2021

Trial Date: None Set

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I, Korey Curley, declare as follows:

1. I am an individual over the age of 18 and one of the named plaintiffs in this matter.

This declaration is submitted in support of approval of the proposed class and PAGA action 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 was employed by Defendants Par Electrical Contractors, Inc. and Quanta Services, Inc. ("Defendants") as a non-exempt employee from approximately March 3, 2006 through December 11, 2020. During my employment with Defendants I worked in the positions of Journeyman Lineman, completing electrical installations, and Quality Control Inspector, inspecting finished installations and writing reports on them. I worked in various areas throughout California, including Escondido, Vista, Rancho Cucamonga, Fontana, Beaumont, Lake Arrowhead, Palmdale, and Orange. During my employment I was subject to a Collective Bargaining Agreement.

3. Throughout my employment with Defendants, they did not provide me with timely, uninterrupted 30-minute meal periods. Specifically, my shifts were regularly 10.0 to 11.0 hours, and my workweeks were often 50 or 60 hours. Despite my lengthy shifts, I was not provided with first meal periods before the fifth hour of work, or my meal periods before the tenth hour of work. Despite this, I was instructed to, and did, manually write in lunch breaks that I did not actually take, instead working straight through my shifts. Additionally, I believe that I was not paid all my wages since I was not compensated during the time I worked through my purported meal periods.

4. Moreover, Defendants did not provide me with all my rest periods. I understand the Collective Bargaining Agreement only allowed me two rest periods per workday and failed to account for any third rest periods when I worked over 10.0 hours. In reality, I was not authorized and permitted *any* rest periods. As with meal periods, I was pressured to skip my rest periods and continue working through any purported rest periods.

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5. I brought this lawsuit to help not only myself, but other employees of Defendants. I believed Defendants were not following the law, and felt a responsibility to try to get them to correct their practices, or to pay for the harm their practices had caused. Being actively involved in this litigation from the onset, I understand that I did more work than the other class members to move this case forward. I also understood that unlike other class members, my unique name would be on this lawsuit, and future employers could see that I had sued my former employer. I chose to move forward with my case anyway, because I believed it was the right thing to do. With my help, my attorneys settled this matter with Defendants and now current and former employees will benefit from the settlement. I believe that I should be compensated for carrying the burden of acting as the class representative for the benefit of other employees.

6. I have been an active participant in this case ever since first consulting with my attorneys almost five years ago. Among other things, I searched for and provided relevant documents for use in the lawsuit, I provided factual information to my attorneys, had various phone calls with my attorneys to discuss the claims in the lawsuit and Defendants' policies and practices, litigation strategy, and updates on how the case was proceeding and how I could further help the case, assisted my attorneys to help them prepare for two separate mediations, made myself available during the full day of both mediations to answer any questions posed by the mediators, discussed the status of the case and the settlement agreement with my attorneys, and otherwise assisted my attorneys in moving this case towards resolution. I estimate that I have spent at least 50 hours in total on these activities.

7. As far as I am aware, I have no actual or potential conflicts of interest with any of the Settlement Class members or with the proposed settlement administrator, Apex.

I declare under penalty of perjury under the laws of the state of California and the United States that the foregoing is true and correct. Executed on October 23, 2025 at Ramona, California.

Signed by: 
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Corey Curley