

Michael Nourmand, Esq. (SBN 198439)
mnourmand@nourmandlawfirm.com
James A. De Sario, Esq. (SBN 262552)
jdesario@nourmandlawfirm.com
THE NOURMAND LAW FIRM, APC
8822 West Olympic Boulevard
Beverly Hills, California 90211
Telephone: (310) 553-3600
Facsimile: (310) 553-3603

Attorneys for Plaintiff
JORGE GONZALEZ TREJO, on behalf of
himself and all others similarly situated
[Additional counsel on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JORGE GONZALEZ TREJO, DANNY
LOPEZ and LEWIS RENTERIA, on behalf
of themselves and all others similarly
situated,

Plaintiffs,

v.

MENZIES AVIATION (USA) INC., a
Delaware corporation; AIRCRAFT SERVICE
INTERNATIONAL, INC., a Delaware
corporation; AIR MENZIES
INTERNATIONAL (USA), INC., a
corporation; and DOES 1 through 100,
inclusive

Defendants.

CASE NO. 23STCV15453
Consolidated with Case No. 21STCV26797

[Assigned for all purposes to the
Hon. William F. Highberger, Dept. 10]

**DECLARATION OF PLAINTIFF DANNY
LOPEZ IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date:
Time:
Dept.: 10

Complaint Filed: June 30, 2023
Trial Date: None Set

1 MATERN LAW GROUP, PC
2 MATTHEW J. MATERN (SBN 159798)
3 mmatern@maternlawgroup.com
4 MATTHEW W. GORDON (SBN 267971)
5 mgordon@maternlawgroup.com
6 IRINA KIRNOSOVA (SBN 312565)
7 ikirnosova@maternlawgroup.com
8 2101 E. El Segundo Boulevard, Suite 403
9 El Segundo, California 90245
10 Telephone: (310) 531-1900
11 Facsimile: (310) 531-1901

12 Attorneys for Plaintiffs
13 DANNY LOPEZ and LEWIS RENTERIA
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF DANNY LOPEZ

I, Danny Lopez, declare as follows:

1. I am a named plaintiff in the above-captioned action entitled *Jorge Gonzalez Trejo et al. v. Menzies Aviation (USA) Inc., et al.*, Los Angeles County Superior Court Case No. 23STCV15453. I am also the named plaintiff in *Lopez v. Aircraft Service International, Inc., et al.*, Los Angeles County Superior Court Case No. 21STCV26797.

2. This declaration is based on my personal firsthand knowledge, unless another source of information or belief clearly appears from the context, and as to all such matters, I believe them to be true. If called as a witness, I could and would readily and competently testify to all matters stated in this declaration.

3. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

4. I was employed by Defendant Aircraft Service International, Inc. as a non-exempt airplane fueler at Los Angeles International Airport in California from December 2007 to April 2021.

5. In January 2021, I retained Matern Law Group, PC ("MLG") to represent me in my wage and hour claims against Defendants. Since that time I have actively participated in this case, as follows: I submitted to a lengthy interview process with MLG; I have spent many hours assisting my attorneys, including searching for and locating documents related to my employment with Defendants and providing my attorneys with copies of any documents I was able to find; I have reviewed documents relating to this case, including the Class Action and PAGA Settlement Agreement and this declaration; I have made decisions in the case, including regarding settlement; I have had numerous, extensive discussions with my attorneys regarding Defendants' policies, practices and procedures, how Defendants operate as well as my experiences generally working for Defendants; I made myself available for the entire day of the mediation; I maintained regular contact with my attorneys throughout the case; I kept myself informed of the developments in the case at all times; I asked my attorneys questions regarding the case; and I made sure I understood everything that was going on in the case so I could make the best-informed decisions on behalf of the class and myself. I estimate that I have spent approximately 35-40 hours on this case over more than five years.

1
2 6. I seek to be appointed as a class representative in this case. I understand that a class
3 representative: (a) represents the interests of all members of the class in litigation to recover money
4 damages or obtain injunctive relief for the class; (b) has claims that are typical of those of the class,
5 thus involving common issues of law or fact; (c) acts as a fiduciary to the class, always considering the
6 interests of the class just as they would consider their own interests and, sometimes putting the
7 interests of the class before their own interests; (d) actively participates in the lawsuit, as necessary;
8 (e) may be required to travel to give such testimony; (f) recognizes and accepts that any resolution of
9 the lawsuit, by dismissal or settlement, is subject to court approval and must be in the best interest of
10 the class as a whole; (g) should follow the progress of the lawsuit and provide all relevant facts to the
11 lawyers for the class; and (h) volunteers to represent or champion many other people with similar
12 claims and damages because of the importance of the case and the necessity that all class members
13 benefit from the lawsuit equally.

14 7. I understand that the members of the proposed class are similarly situated with respect
15 to a common course of conduct, policy, or practice. I believe that, during my employment with
16 Defendants, I was subjected to the same uniform policies, procedures, and practices as other members
17 of the proposed class with respect to reimbursement of employee expenses.

18 8. I realized the risks I would be taking by pursuing this class action as a named plaintiff
19 and class representative. I knew that my current employer might retaliate against me for bringing this
20 lawsuit or that future employers might conduct a background check on me or otherwise find out about
21 my participation in the case and be unwilling to hire me as a result.

22 9. I also knew there was no guarantee about the outcome of the case, and that if
23 Defendants were to prevail, I could be liable for their litigation costs, in addition to being responsible
24 for paying my own litigation costs. Despite these risks, I felt so strongly about standing up for the
25 rights of my coworkers that I initiated and participated in this lawsuit.

26 10. As part of the Class Action and PAGA Settlement Agreement, I am releasing all of my
27 individual claims arising from my employment with Defendants and am also waiving my rights under
28

1 Civil Code section 1542 as to any claims against Defendants. I understand that this release is a more
2 comprehensive release than the release that applies to the other class members.

3 11. I placed the interests of my co-workers and other non-exempt employees of Defendants
4 ahead of my own interests by postponing the prosecution of my individual wage and hour claims and
5 any recovery for myself alone so that the case could be litigated and resolved as a class action, which
6 benefitted the class as a whole and not just my interests.

7 12. In agreeing to be a named Plaintiff in this case, I understand that in some situations, I
8 must put the interests of class members before my own interests. As a class representative, I will
9 always consider the interests of class members just as I would consider my own interests, and I will
10 continue to actively participate in the case, as necessary.

11 13. I have not entered into any undisclosed agreements, nor have I received any
12 undisclosed compensation in this case. The only compensation I will receive is whatever amount the
13 Court awards as a service award, as well as my Individual Class Payment and Individual PAGA
14 Payment.

15 14. I do not believe that I have any conflicts with, or interests that are adverse to, the other
16 class members.

17 15. I am not related to anyone at Matern Law Group, PC.

18 16. Throughout this case, I did the best I could to represent the class and to look out for its
19 interests. I recognize and accept that any resolution of the case is subject to court approval, and must
20 be in the best interests of the class as a whole.

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

23 Executed on March ²⁴__, 2026 at Inglewood, California.

24 
25 [Danny Lopez \(Mar 24, 2026 16:43:21 PDT\)](#)

26 DANNY LOPEZ
27
28

2026 03 20 Trejo Lopez - Lopez Dec ISO MPA

Final Audit Report

2026-03-24

Created:	2026-03-20
By:	Jasmin Hidalgo (jhidalgo@maternlawgroup.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAvxFKecq9w6qpoE3pLpt_efF8mWOXznRn

"2026 03 20 Trejo Lopez - Lopez Dec ISO MPA" History

-  Document created by Jasmin Hidalgo (jhidalgo@maternlawgroup.com)
2026-03-20 - 10:02:15 PM GMT- IP address: 12.77.84.26
-  Document emailed to Danny Lopez (lopezd56@yahoo.com) for signature
2026-03-20 - 10:03:35 PM GMT
-  Email viewed by Danny Lopez (lopezd56@yahoo.com)
2026-03-24 - 11:40:27 PM GMT- IP address: 67.211.207.65
-  Document e-signed by Danny Lopez (lopezd56@yahoo.com)
Signature Date: 2026-03-24 - 11:43:21 PM GMT - Time Source: server- IP address: 67.211.207.65
-  Agreement completed.
2026-03-24 - 11:43:21 PM GMT