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Attorneys for Plaintiff Raul Antonio Castro

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

RAUL ANTONIO CASTRO,

Plaintiff,

v.

CLAY LACY AVIATION, INC., and DOES 1
to 100,

Defendants.

) Case No. 21VECV00304
) Hon. Huey Cotton
) Dept. A

) **DECLARATION OF SARA**
) **SCHWERMER-SWEEN FOR RUST**
) **CONSULTING, INC. IN REGARD TO**
) **PAYMENTS**

1 I, Sara Schwermer-Sween, declare as follows:

2 1. I am a Program Manager for Rust Consulting, Inc. ("Rust"). My business address
3 is 920 2nd Ave S, Suite 900, Minneapolis, Minnesota 55402. My telephone number is (612) 359-
4 2077. I am over twenty-one years of age and am authorized to make this declaration on behalf of
5 Rust and myself.

6 2. Rust has extensive experience in class action matters, having provided services in
7 class action settlements involving antitrust, securities fraud, property damage, employment
8 discrimination, employment wage and hour, product liability, insurance and consumer issues. We
9 have provided notification and/or claims administration services in more than 8,500 cases. Of
10 these, approximately 4,000 were Labor & Employment cases.

11 3. Rust was engaged by Counsel for the Plaintiffs and Counsel for the Defendants
12 (collectively the "Parties") to provide notification services in the *Castro v. Clay Lacy, Inc.*
13 Settlement ("Settlement"). Duties included: a) drafting and mailing Settlement Award checks; and
14 b) for such other tasks as the Parties mutually agree or the Court orders Rust to perform.

15 4. On or about September 16, 2024, Rust received the Court approved Gross
16 Settlement Amount, in the amount of \$760,000.00, that was deposited into the Qualified
17 Settlement Fund ("QSF").

18 5. On or about September 20, 2024, Rust prepared and executed a wire transfer for
19 Class Counsel's Attorneys' Fees and Costs to Janelle Carney, in the amount of \$148,106.80.

20 6. On or about September 20, 2024, Rust prepared and executed a wire transfer for
21 Class Counsel's Attorneys' Fees and Costs to Frontier Law Center, in the amount of \$151,169.01.

22 7. On or about October 30, 2024, Rust prepared and mailed Settlement Award checks
23 to 444 eligible Class Members, in the net after-tax amount of \$115,512.55. This includes the
24 Individual Settlement Amounts paid to the Class Representative, Raul Castro, in the amount of
25 \$5,000.00.

26 8. On or about October 30, 2024, Rust prepared and mailed a check to the California
27 Labor and Workforce Development Agency, in the amount of \$331,537.50.

9. On or about October 31, 2024, Rust prepared and executed a wire transfer the payment for the cost of administering the Settlement, in the amount of \$6,950.00.

10. The void date for the checks is April 28, 2025. Pursuant to the Settlement Agreement, for any Aggrieved Employee whose Individual PAGA Payment check is uncashed and cancelled after the void date, the Administrator shall transmit the funds represented by such checks to the California Controller's Unclaimed Property Fund in the name of the Aggrieved Employee.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge and that this Declaration was executed this 1st day of November, 2024, at Minneapolis, MN.


SARA SCHWERMER-SWEEN

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of eighteen (18) and not a party to the within action; my business address is 14758 Pipeline Avenue, Suite E, Second Floor, Chino Hills, CA 91709-6025.

On April 1, 2025, I served the foregoing document described as:

**DECLARATION OF SARA SCHWERMER-SWEEN FOR RUST
CONSULTING, INC. IN REGARD TO PAYMENTS**

on INTERESTED PARTIES in this action as stated below:

O'HAGAN MEYER

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XX BY E-MAIL: I electronically served the above-mentioned document to each of the above recipients at their respective e-mail addresses. My e-address is: Jerin@JanelleCarneyLaw.com

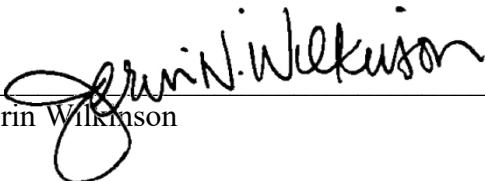
California Labor & Workforce Development Agency

XX VIA ONLINE FILING:

<http://www.dir.ca.gov/private-attorneys-general-act/private-attorneys-general-act.html>

Executed on April 1, 2025 at Chino Hills, California.

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


Jerin Wilkinson