

Janelle Carney (SBN 201570)
 JANELLE CARNEY-ATTORNEY AT LAW, APC
 14758 Pipeline Ave., Suite E
 Chino Hills, CA 91709-6025
 Telephone: (909) 521-9609 / Facsimile: (909) 393-0471
 E-mail: janelle@janellecarneylaw.com

Electronically FILED by
 Superior Court of California,
 County of Los Angeles
 8/14/2024 3:43 PM
 David W. Slayton,
 Executive Officer/Clerk of Court,
 By M. Estorga, Deputy Clerk

Adam Rose (SBN 210880)
adam@frontierlawcenter.com
 Manny Starr (SBN 319778)
manny@frontierlawcenter.com
 FRONTIER LAW CENTER
 23901 Calabasas Road, #1084
 Calabasas, CA 91302
 Telephone: (818) 914-3433 / Facsimile: (818) 914-3433

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

**JOINT MOTION FOR AN ORDER
 APPROVING PAGA SETTLEMENT;
 DECLARATION OF RAUL ANTONIO
 CASTRO IN SUPPORT THEREOF**

Date: September 30, 2024
 Time: 8:30 AM
 Dept.: Dept A.
 Reservation No.: 984467893626

**JOINT MOTION FOR AN ORDER APPROVING PAGA SETTLEMENT;
 DECLARATION OF RAUL ANTONIO CASTRO FILED IN SUPPORT THEREOF**

1 I, Raul Antonio Castro, declare:

2 1. I am the Plaintiff in this action. I am an adult over the age of 18. The foregoing is
3 based on my personal knowledge, and if called as a witness, I would and could competently testify
4 thereto.

5 2. I was employed as a shipping and receiving clerk with Defendant Clay Lacy
6 Aviation, Inc. (Defendant"). I settled my individual FEHA and PAGA claims in February 2023.
7 The PAGA representative claims remained.

8 3. During the pendency of this case, I have spent time with my attorneys discussing the
9 nature of my complaints and the state of my case. I have assisted in the prosecution of this case by
10 reviewing my own documents with the attorneys, identifying witnesses, reviewing documents from
11 my attorneys, and reviewing discovery. I participated in the mediation of this case telephonically
12 and gave my approval to settle after being fully informed by my counsel.

13 4. I understood that this action was being prosecuted on behalf of the State of
14 California as a private attorney general on my behalf and other aggrieved employees. During the
15 pendency of this lawsuit, I was required to provide assistance to my attorneys, including frequently
16 discussing the case with them and providing them with information. I have spent a significant
17 amount of time discussing this matter with my attorneys on many occasions and explaining my
18 understanding of the company's policies and practices, as well as reviewing Defendant's produced
19 documents. Further, I was involved in the negotiations that led to the settlement in this matter. I
20 also reviewed and signed the stipulation to settle, Settlement Agreement, and this Declaration.
21 Throughout this approximately three-year-old case, I have continuously been kept apprised of the
22 case status.

23 5. I am aware and have been aware from the inception of the case, that there is the risk
24 that if I did not win, I could be liable for Defendant's costs. I accepted that risk in this case.

25 6. I am aware and have been aware since the filing of this case, that my filing this
26 action and my participation could jeopardize my future employability.

27 7. I understood from the inception of the case that a representative lawsuit could take
28 longer than an individual action and I accepted that burden.

1 8. I believe that the settlement is fair, adequate, and reasonable for the aggrieved
2 employees and the State of California. I am proud of the result and accomplishment of this lawsuit
3 given the procedural posture of this case and the likelihood of recovery at trial which was set to
4 proceed in November.

5 9. I signed a Joint Prosecution Agreement approving the following fee split between
6 my counsel's firms:

<u>Attorney</u>	<u>Percentage of Fee Award</u>
Janelle Carney – Attorney at Law APC	50%
Frontier Law Center	50%

10 10. Based on the excellent result, I reiterate my full support for the entirety of the
11 settlement and request that the Court enter the proposed Approval Order.

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

14 Date: 8/14/2024

Signed by:

Raul Castro

7B802AED79404DF...

RAUL ANTONIO CASTRO

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 August 14, 2024, I served the foregoing document described as:

**JOINT MOTION FOR AN ORDER APPROVING PAGA SETTLEMENT;
DECLARATION OF RAUL ANTONIO CASTRO FILED IN SUPPORT THEREOF**

on INTERESTED PARTIES in this action as stated below:

O'HAGAN MEYER

Daniel H. Qualls

dqualls@ohaganmeyer.com

Cruz Zavala

czavala@ohaganmeyer.com

One Embarcadero Center, Suite 2100

San Francisco, CA 94111

Adam Rose (210880)

adam@frontierlawcenter.com

Manny Starr (319778)

manny@frontierlawcenter.com

FRONTIER LAW CENTER

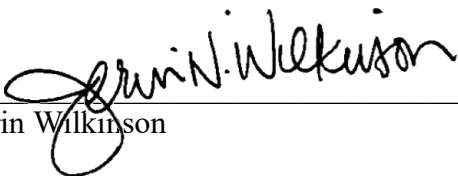
23901 Calabasas Road, #2074

Calabasas, CA 91302

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

Executed on August 14, 2024 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