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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

CASSANDRA NEGRETE, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

WINSUPPLY INC., a Delaware
corporation; ORANGE COUNTY
WINDUSTRIAL CO., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 30-2021-01188066-CU-OE-CXC

(Assigned for all purposes to the Hon. Randall J.
Sherman, Dept. CX105)

**DECLARATION OF CASSANDRA NEGRETE
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: July 14, 2023

Time: 10:00 a.m.

Dept.: CX105

Complaint Filed: March 9, 2021

FAC Filed: April 13, 2022

SAC Filed: January 19, 2023

Trial Date: None Set

DECLARATION OF CASSANDRA NEGRETE

I, Cassandra Negrete, declare as follows:

1. I am an individual over the age of 18 years old 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 was employed by Defendants Winsupply Inc. and Orange County Windustrial Co. (collectively, "Defendants") as a non-exempt, hourly employee from about January 2017, until on or about April 1, 2020.

3. Like other Class Members, during my employment with Defendants, I was not provided with off-duty meal and rest breaks, timely paid all regular, minimum, and overtime wages owed, paid all wages owed upon separation of employment, reimbursed for business expenses, and not provided with accurate itemized wage statements.

4. During the course of this litigation, I have made myself available to answer questions, gather documents, and prepare and review any written responses. I have also discussed the case with my lawyers on many occasions to provide insights into the practices of my former employer, as detailed below.

5. Throughout this litigation, I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining Defendants' practices. I have conferred with my attorneys to discuss this case and the facts involved. I also conferred with my attorneys to respond to questions and to provide documents.

6. I understand that this action was brought on behalf of all other current and former employees within the State of California, and thus I am acting as a representative for the Class. As class representative, I understand that it is my responsibility to act in the best interest of the Class and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

7. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent

1 the interests of the Class. I also understand my duties and responsibilities to the proposed class and
2 will carry out those duties as necessary. Thus far I have spent approximately 25 hours on this matter
3 meeting with my attorneys, gathering relevant case documents and information, reviewing case
4 documents, reviewing the settlement agreement, MOU, and declarations submitted in this case.

5 8. I have discussed the terms of the settlement with my attorneys, and based on the
6 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and
7 for the entire Class.

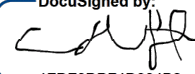
8 9. I am aware and have been aware from the inception of the case, that there is the risk
9 that if I do not win my case, then I could be liable for Defendants' litigation costs. I accepted that
10 risk in this case. I also understood that an individual case would have resolved much faster than a
11 class action and involved much less financial risk than a class action.

12 10. I understood that filing this lawsuit is a public record. Further, I understood that,
13 because this lawsuit is a public record, it could and can adversely affect my ability to obtain
14 employment.

15 11. I also understand that I am releasing all known and unknown claims, including any
16 rights I might have under Civil Code § 1542. It is my understanding that Class Members were not
17 required to agree to waive such claims.

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

20 Executed on this 16 day of June 2023, at Anaheim, California.

21 DocuSigned by:
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24 Cassandra Negrete
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