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Attorneys for Plaintiff RAYMUNDO VALLES
individually and on behalf of similarly situated employees

SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF CALAVERAS

RAYMUNDO VALLES, individually and on
behalf of all other similarly situated
employees,

Plaintiff,

vs.

TRICORP GROUP, INC., a California
Corporation; and DOES 1 to 100, inclusive,

Defendant.

Case No. 21CV45611

CLASS ACTION

**DECLARATION OF RAYMUNDO VALLES
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 9, 2022

Time: 9:00 a.m.

Dept.: 2

Judge: Hon. David Sanders

Filed: September 16, 2021

Trial Date: None Set

1 I, Raymundo Valles, declare:

2 1. I am a competent adult, I have personal knowledge of the facts set forth in this
3 declaration, and I am making this declaration on behalf of myself, as a named plaintiff, and in support
4 of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement.

5 2. I worked for Defendant Tricorp Group, Inc., ("Defendant") from approximately June 9,
6 2020 to March 10, 2021 as a non-exempt plumber and construction worker receiving an hourly wage. I
7 was subject to all of Defendant's policies and practices that have been alleged as unlawful in the
8 complaint and the notice sent to the Labor and Workforce Development Agency, including the
9 following: failure to pay overtime, failure to pay minimum wages, failure to provide accurate wage
10 statements, failure to provide meal and rest periods or pay premiums in lieu thereof, wage statement
11 violations, failure to reimburse expenses, request for waiting time penalties and unfair competition.

12 3. I have actively participated in the litigation of this case for the benefit of all Class
13 Members. Prior to obtaining an attorney, I performed several hours of research trying to find a quality
14 attorney to handle the claims. I also performed several hours of research on the potential claims, so I
15 could be sure I could have an informed discussion with the attorneys about the claims and have a better
16 idea of what to expect in litigation and how to help the case proceed. After securing Shimoda &
17 Rodriguez Law, PC, I continued to be actively involved in the case to help ensure a positive outcome.

18 4. I have given a detailed account of all the facts related to my employment and the claims
19 asserted in the Complaint. I provided extensive documentation in support of the claims brought against
20 Defendant including paystubs, Defendant's policies, text messages, pictures, and other documents
21 related to my work with Defendant and to the claims brought in the class action. I met with and
22 assisted my attorneys for several hours on numerous occasions in understanding the documents and
23 providing context for Defendant's payroll process as it applied to me and how I believed it applied to
24 Defendant's other employees. I called for status updates one (1) to two (2) times a week and would
25 take any extra steps needed as a result of those calls, whether it was trying to find more documents,
26 witnesses, etc. I spent a very substantial amount of time trying to find witnesses to help support the
27 claims. I made efforts to track down and call approximately twenty-five (25) individuals and make
28 sure they were willing to provide information to my attorneys. This not only included calling and

1 texting, but traveling to meet them in person. Ultimately, I was able to secure seven (7) witnesses for
2 my attorneys to speak to in order to get declarations to help substantiate the claims. During the course
3 of negotiations in this case, I spoke with my attorneys many times to discuss the factual assertions
4 being made by Defendant, facts supporting rebuttal arguments, as well as settlement strategies and
5 potential outcomes.

6 5. My attorneys explained to me the risks and benefits of bringing a class action and a
7 claim under the Private Attorneys General Act. I understood that I took on the risk, both professionally
8 and financially, in pursuing the case as a class and representative action rather than pursuing my claims
9 individually. I understood that pursuing the case as a class action meant that it would take substantially
10 longer than pursuing a claim with the California Labor Commissioner and that I risked getting nothing
11 in the end, but I believed it was important to make sure that Defendant followed the law for everyone.

12 6. I maintained communication with my attorneys throughout the litigation, discussing the
13 facts and policies at issue in the case with them. I asked questions when I needed clarification about
14 various aspects of this case to make sure there were continually steps taken to advance the interests of
15 the class. I also understood that the recovery in this case was for the benefit of my fellow coworkers,
16 not just for me. When my attorneys contacted me asking about more information or documents related
17 to the case, I made myself available and tried to give or obtain any additional information I could. I
18 participated in the negotiations and settlement discussions in this case while speaking with my attorney
19 to answer questions, provide any additional information needed to assist the negotiations, and
20 discussing the potential terms of the Agreement to evaluate its adequacy. Since notice of the settlement
21 was mailed to Class Members, I have also fielded questions by Class Members about this case and
22 helped to direct them to my attorneys and/or the Settlement Administrator to make sure they
23 understood the settlement terms. Overall, I have spent an enormous amount of time assisting in the
24 prosecution of this case. Also, as part of the settlement, I am giving a broader release than any Class
25 Members in that I am waiving any and all claims I have as well as the protections of Civil Code section
26 1542 for unknown claims.

9. As a Class Representative, I took on the risk of having to pay Defendant's costs if we were unsuccessful in bringing our claims.

10. I understand that any Class Representative Enhancement Payment I may receive is for my participation as a Class Representative and it is not contingent on my support or approval of the Agreement. I do not believe I have any conflicts with any Class Members.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 07/29/2022 of July 2022, in Sacramento, California.

DocuSigned by:

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RAYMUNDO VALLES