

Larry W. Lee (State Bar No. 228175)
Kwanporn “Mai” Tulyathan (State Bar No. 316704)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
ktulyathan@diversitylaw.com

William L. Marder (State Bar No. 170131)
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile
bill@polarislawgroup.com

Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

TONY CATELLI, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

INNOVATIVE CONSTRUCTION
SOLUTIONS, a California corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: MSC21-01257

(Assigned for all purposes to the Honorable
Edward G. Weil, Department 39)

**DECLARATION OF TONY CATELLI IN
SUPPORT OF PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: TBD

Time: 9:00 a.m.

Dept.: 39

Complaint Filed: June 1, 2021

Trial Date: None Set

DECLARATION OF TONY CATELLI

I, Tony Catelli, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. This declaration is submitted in support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement and for my enhancement payment of \$2,500.00.

3. I was employed by Defendant Innovative Construction Solutions ("Defendant") as a Technician 2 from approximately December 2002, until about February 12, 2021. I worked as an hourly, non-exempt employee.

4. During my employment with Defendant, I am informed and believe, and on that basis state, that Defendant failed to provide me with accurate wage statements. Specifically, it is my understanding, Defendant did not include the pay period start date on my wage statements.

5. I do not believe I have any interests that are adverse to the other employees that are part of this class action settlement.

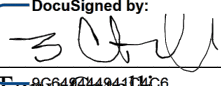
6. I have spent a very significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of the company's practices. I have provided information and documents to my attorneys regarding my employment with Defendant.

7. During the course of this litigation, I have always made myself available to answer questions, gather and forward documents, review and execute the memorandum of understanding, and review and execute the settlement agreement and this declaration. I will continue to make myself available to review any other documents needed to bring this matter to conclusion.

8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on December 14, 2022, at woodland, California.

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4 DocuSigned by:

5 Tony Catelli
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