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

JAVIER SANTIAGO, individually, and on
behalf of all others similarly
situated,

Plaintiff,

v.

CAL TECH PRECISION, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendant.

Case No.: 30-2021-01195725-CU-OE-CXC

**CLASS AND REPRESENTATIVE
ACTION**

[Assigned for all purposes to: Hon. David A.
Hoffer, Dept. CX-103]

**DECLARATION OF PLAINTIFF JAVIER
SANTIAGO IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

FINAL APPROVAL HEARING

Date: April 27, 2026
Time: 1:30 p.m.
Dept: CX-103

Complaint filed: April 15, 2021
FAC filed: August 15, 2023
Trial date: Not set

I, Javier Santiago, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Defendant Cal Tech Precision, Inc. ("Defendant"). I worked for Defendant from approximately January 2012 to approximately December 2020 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys General Act ("PAGA") Notice sent to Defendant and the Labor & Workforce Development Agency ("LWDA").

4. I initiated this lawsuit because I experienced and observed that I and other employees were not properly compensated for all hours worked, including work performed off the clock, and were not provided legally compliant meal and rest breaks. For example, my meal periods were often late or interrupted, and I was not provided second meal periods when working long shifts.

5. I first contacted Wilshire Law Firm because I believed that employees were not being properly paid for all hours worked and were not receiving legally required meal and rest breaks. I personally experienced these issues throughout my employment, including having to remain on duty during breaks and performing work after clocking out. After speaking with counsel, I agreed to serve as a class representative so that these issues could be addressed on behalf of other employees. I hope that I might be able to change Defendant's policies to better

1 protect the working conditions of my co-workers. I also understood that it was my duty as a
2 class representative to represent the best interests of the class, know about the lawsuit, assist
3 my attorneys, and keep updated on the case.

4 6. I have invested a significant amount of my personal time and energy into this
5 lawsuit. I spent approximately 45 hours, if not more assisting with the case, including
6 communicating with my attorneys, providing detailed information regarding my employment,
7 reviewing documents, and participating in the litigation process.

8 7. Throughout this case, I spent a lot of time on the phone with my attorneys to get
9 updates about the case and provide them with information, including issues related to missed
10 meal periods, timekeeping practices, and unpaid work time. For example, during some of the
11 phone calls, my attorneys and I were able to identify instances when I was not paid correctly.
12 I also reviewed my pay records and time records with my attorneys, which reflected issues
13 such as late meal periods and unpaid time. Additionally, leading up to the mediation in
14 January 2022, I had multiple lengthy phone calls with Wilshire Law Firm regarding the claims
15 at issue and what was to transpire at the mediation. These communications helped my
16 attorneys understand Defendant's timekeeping and pay practices and evaluate the claims in
17 this case.

18 8. Throughout the case, I spent time looking for documents relevant to the case to
19 send to my attorneys. I spent numerous hours looking for these documents when I first
20 contacted my attorneys, before my attorneys filed the case, and before my case was mediated.
21 The information I provided, including details about my work schedule, meal periods, and
22 hours worked, assisted my attorneys in analyzing Defendant's policies and estimating
23 damages. I also spent time reviewing legal documents in this case, including the retainer and
24 settlement agreement, and discussed the terms in detail with my attorneys. The information I
25 provided assisted my attorneys in analyzing Defendant's policies and calculating potential
26 damages.

27 9. Additionally, I remained available and actively communicated with my
28

attorneys throughout the mediation process, including answering questions and providing input regarding my experiences and the settlement discussions, including the strengths and weaknesses of the claims and the potential recovery for the class. I understood my role as a class representative required me to actively participate and assist my attorneys, and I took that responsibility seriously throughout the litigation.

10. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I had the opportunity to represent the class in this lawsuit and that I was able to recover money through a settlement for the class.

11. I did not make the decision to file a class action lightly. I understood that my name would appear in a publicly filed lawsuit against my former employer and that this could potentially affect future employment opportunities. Despite those concerns, I believed it was important to pursue the claims in order to address the wage-and-hour practices that affected me and other employees.

12. I also understood there were risks in bringing this lawsuit, including potential impacts on my future employment and the uncertainty of the outcome. Despite these risks, I chose to move forward because I believed it was important to address these issues.

13. I understand that the settlement agreement provides a service payment to me of up to \$10,000.00. I believe this amount is fair compensation for my time and effort on this case, for helping to prosecute this case, and the risks with respect to my future employment. In addition, the settlement requires that I enter into a general release, which I understand is broader than the release that will bind other class members. I am receiving no additional compensation for the risks I undertook in bringing this case on behalf of other employees.

14. Based on my involvement in this case and the benefits provided to my former co-workers, I can say I helped stand up for the other workers who were too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping

1 out my former co-workers and want to help ensure that employees are treated fairly under
2 California law.

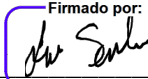
3 15. I reviewed (and ultimately signed) the Class Action and PAGA Settlement
4 Agreement in full and my attorneys answered all the questions I had. I believe the settlement
5 terms and allocations are fair, adequate, and reasonable given the strength of the class claims
6 and Defendant's defenses.

7 16. I have no conflicts of interest with any class member or the Settlement
8 Administrator, CPT Group, Inc.

9 17. I am not aware of any other pending matter or action asserting claims that will
10 be extinguished or adversely affected by the Settlement.

11
12 I declare under penalty of perjury under the laws of the State of California and the United
13 States that the foregoing is true and correct.

14
15 Executed on 3/24/2026 , at Anaheim, California.

16
17
18  Firmado por:
19 51BE666D631D456...
20 Javier Santiago