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

JUSTIN CANELIAS, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

GLOBAL SYN-TURF, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendant.

JUSTIN CANELIAS, individually, and on
behalf of aggrieved employees pursuant to the
California Private Attorney General Act;

Plaintiff,

vs.

GLOBAL SYN-TURF, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendant.

Case No.: RG21090397
[Consolidated with Case No. RG21104966]

Honorable Michael Markman
Department 23

CLASS ACTION

**DECLARATION OF JUSTIN CANELIAS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 8, 2024
Time: 10:00 a.m.
Department: 23

Class Action Filed: February 23, 2021
PAGA Action Filed: June 17, 2021
Trial Date: None Set

DECLARATION OF JUSTIN CANELIAS

I, **Justin Canelias**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Global Syn-Turf, Inc. ("Global Syn-Turf") as an hourly-paid Warehouse associate from approximately September 2017 to approximately March 2020. I decided to seek legal advice about my work experiences with Global Syn-Turf. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Global Syn-Turf paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. Ultimately, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **9 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and eventually, a PAGA representative.

3. I have spent over **14 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which has included gathering documents concerning my employment with Global Syn-Turf, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other employees. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **13 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Global Syn-Turf.

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5. On January 19, 2022, I attended a deposition that lasted approximately **2.75 hours**. I spent at least **4 hours** preparing for the deposition. After the deposition, I spent at least **2 hours** reviewing my testimony and discussing the contents of the deposition transcript with my attorneys. And on July 18, 2022, I attended a second deposition that lasted approximately **1 hour**. I spent at least **2 hours** preparing for the second deposition. After that deposition, I spent at least **1 hour** reviewing my testimony and discussing the contents of the deposition transcript with my attorneys.

6. As far as the settlement is concerned, I spent about **3 hours** reviewing the settlement agreement and about **2 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

7. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$10,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

8. I am not related to anyone associated with Lawyers *for* Justice, PC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement as a class member and as an aggrieved employee.

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

Executed on this day 06/24/2024, at Los Angeles, California.

Electronically Signed _____ 2024-06-24 22:52:28 UTC - 172.58.211.104

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Justin Canelias