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Attorneys for Plaintiffs Alberto Gonzalez and James Picarello and the Class

[Additional counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – COMPTON COURTHOUSE**

ALBERTO GONSALEZ, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

CARLTON FORGE WORKS, a California
corporation; PRECISION CASTPARTS
CORP., an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

DONALD BENNETT, as an aggrieved
employee pursuant to the Private Attorneys
General Act (“PAGA”), on behalf of the
State of California and other aggrieved
employees,

Plaintiff,

vs.

CARLTON FORGE WORKS, a California
corporation; PRECISION CASTPARTS
CORP., an Oregon corporation; WYMAN-
GORDAN COMPANY, a Massachusetts
corporation; and DOES 1 through 10
inclusive,

Defendants.

Case No.: 21CMCV00141

Honorable Fumiko Wasserman
Department B

CLASS ACTION

**DECLARATION OF JAMES
PICARELLO IN SUPPORT OF
PLAINTIFFS’ MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement, Class
Counsel Fees Payment, Class Counsel
Litigation Expenses Payment, and Class
Representative Service Payments; Declarations
of Class Counsel (Joanna Ghosh and Raul
Perez); Declaration of Class Representative
(Alberto Gonzalez); Declaration of Settlement
Administrator (Jennifer Beliveau); and
[Proposed] Final Approval Order and Judgment
filed concurrently herewith]

Reservation ID:	Scheduled by Court
Date:	March 19, 2024
Time:	8:30 a.m.
Department:	B

<i>Gonzalez</i> Action Filed:	June 7, 2021
<i>Bennett</i> Action Filed:	June 25, 2021
<i>Picarello</i> Action Filed:	July 26, 2021
Trial Date:	None Set

1 JAMES PICARELLO, individually, an on
2 behalf of other members of the general public
3 similarly situated;

4 Plaintiff,

5 vs.

6 CARLTON FORGE WORKS, INC., a
7 California corporation; and DOES 1 through
8 100, inclusive,

9 Defendants.

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17 Attorneys for Plaintiff Donald Bennett and the Class
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1 spent at least **22 additional hours** speaking with my attorneys about the case, identifying
2 potential witnesses, providing my attorneys with documents and information concerning the
3 case, and also describing policies, practices, and procedures of Carlton Forge.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **4 hours** reviewing the settlement
6 agreement and about **6 hours** asking questions and discussing the potential settlement with my
7 attorneys before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
10 obtained in this case, and as a class representative, I respectfully request that the Court award me
11 a Class Representative Service Payment in the amount of \$10,000.00 for my active participation
12 in this case. Taking into consideration the time that I have dedicated to this case, I believe that
13 this amount is reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as a service payment, as well as my share of the settlement as a class member.

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

20 Executed this ^{09/18/2023} ____ day of September 2023, at Torrance, California.

21 Electronically Signed  2023-09-19 01:14:02 UTC - 47.155.6.183
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22 James Picarello