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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 ALBERTO
GONSALEZ 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
(James Picarello); 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
similarly situated;

3 Plaintiff,

4 vs.

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

7 Defendants.

8 Raul Perez (SBN 174687)
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12 Attorneys for Plaintiff Donald Bennett and the Class
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I, **Alberto Gonzalez**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs 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 Carlton Forge Works (“Carlton Forge”) from approximately November 2019 to approximately April 2020 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at Carlton Forge and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Carlton Forge was held accountable for not properly compensating employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”) and class actions in general, and what it meant to be a named plaintiff, a PAGA representative, and a class representative.

3. I have spent over **20 hours** meeting 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 Carlton Forge, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Carlton Forge. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and to provide them with any additional information that I had obtained.

4. Throughout the case, 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

1 them as quickly as possible and gave them as much information and identified as many
2 documents as I could. I spent at least **23 additional hours** speaking with my attorneys about the
3 case, identifying potential witnesses, providing my attorneys with documents and information
4 concerning the case, and also describing policies, practices, and procedures of Carlton Forge.

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

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

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

17 8. I have not entered into any undisclosed agreements, nor have I received any
18 undisclosed compensation in this case. The only compensation I will receive is a service
19 payment, if approved by the Court, as well as any portion of the settlement to which I may be
20 entitled as an aggrieved employee and/or class member.

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

23 09-21-2023

24 Executed this ____ day of September 2023, at Bellflower, California.

25  Electronically Signed 2023-09-21 20:13:26 UTC - 172.56.185.90
Nintex AssureSign® df16d128-eb28-48f2-bc6f-b08401459202

26 Alberto Gonzalez